

# Montana PYs 2020-2023

## Contents

Montana PYs 2020-2023 .....	1
Overview .....	3
Options for Submitting a State Plan.....	3
How State Plan Requirements Are Organized .....	4
I. WIOA State Plan Type and Executive Summary .....	5
a. WIOA State Plan Type.....	5
Combined Plan Partner Program(s) .....	5
b. Plan Introduction or Executive Summary.....	6
II. Strategic Elements .....	7
a. Economic, Workforce, and Workforce Development Activities Analysis .....	7
b. State Strategic Vision and Goals .....	16
c. State Strategy .....	21
III. Operational Planning Elements.....	23
a. State Strategy Implementation .....	24
b. State Operating Systems and Policies .....	32
IV. Coordination with State Plan Programs .....	52
V. Common Assurances (For All Core Programs) .....	54
VI. Program-Specific Requirements for Core Programs .....	55
Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B .....	55
Program-Specific Requirements for Wagner-Peyser Program (Employment Services) .....	78
Program-specific Requirements for Adult Education and Family Literacy Act Programs .....	110
Program-Specific Requirements for Vocational Rehabilitation (Combined or General) .....	124
VII. Program-Specific Requirements for Combined State Plan Partner Programs .....	183
Trade Adjustment Assistance (TAA).....	184
Jobs for Veterans' State Grants.....	184
Senior Community Service Employment Program (SCSEP) .....	190
Performance Indicator Appendix .....	207
All WIOA Core Programs .....	207
Additional Indicators of Performance.....	208
Other Appendices .....	208

# Overview

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly-funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

## Options for Submitting a State Plan

A State has two options for submitting a State Plan— a Unified State Plan or a Combined State Plan. At a minimum, a State must submit a Unified State Plan that meets the requirements described in this document and outlines a four-year strategy for the core programs. The six core programs are—

- the Adult program (Title I of WIOA),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II), and
- the Wagner-Peyser Act Employment Service program (authorized under the Wagner-Peyser Act, as amended by title III),
- the Vocational Rehabilitation program (authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV).

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus one or more of the Combined State Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the "common planning elements" (Sections II-IV of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) <sup>1</sup>
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

[1] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried out by the Department of Housing and Urban Development that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

## How State Plan Requirements Are Organized

The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning.

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
  - State Strategy Implementation,
  - State Operating Systems and Policies,
  - Assurances,
  - Program-Specific Requirements for the Core Programs, and

- Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.<sup>2</sup> States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

**Paperwork Reduction Act:** The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

[2] Target populations include individuals with barriers to employment, as defined in WIOA Sec. 3, as well as veterans, unemployed workers, and youth.

# I. WIOA State Plan Type and Executive Summary

## a. WIOA State Plan Type

**Unified or Combined State Plan.** Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs. Unified or Combined State Plan. Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.

**Unified State Plan.** This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs.

**Combined State Plan.** This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as one or more of the optional Combined State Plan partner programs identified below.

This is a combined plan

## Combined Plan Partner Program(s)

Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

No

Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

No

Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

No

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))

Yes

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)

Yes

Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)

No

Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

Yes

Employment and training activities carried out by the Department of Housing and Urban Development

No

Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))

No

## b. Plan Introduction or Executive Summary

The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

Montana's economy is strong and continues to grow. Montana reported the fourth fastest wage growth among states over the last decade. Over the last year, average wages increased by 3.2 percent, and all regions of the state experienced wage gains. The state's strong wage growth combined with its low unemployment rate suggests Montana's labor markets are tightening and workers are in high demand. Montana's employment projections from 2017 to 2027 show the following:

- Through 2027, Montana is expected to add 3,860 jobs annually. This slow expected growth is due to a tight labor market and worker shortages;
- Montana's labor force is expected to grow by 3,640 workers per year through 2027. Because this growth is less than average employment growth, unemployment rates have the potential to drop to 3.4% by 2027; and
- Employment growth is expected in all five of Montana's economic regions. The fastest growth is anticipated in the Northwest and Southwest regions of the state.

Montana's projected worker shortage and the need to train workers for the career opportunities that exist in the state present both challenges and opportunities for collaboration and partnerships necessary to overcome the workforce hurdles that exist throughout the state. The Workforce Innovation and Opportunity Act (WIOA) and Perkins V challenge the state to combine resources and create partnerships and look to labor market information (LMI) and industry research to develop education and training programs that meet the expectations of the future economy. Montana's Department of Labor & Industry, Montana's University System, and Montana's K-12 education system have established partnerships and are creating a foundation for implementing Perkins V and growing successful strategies established under WIOA.

The WIOA Combined State Plan builds from the groundwork currently in place and aims to further develop a talent development system that enhances training, education, and services available to Montana's current and future workforce. Over the coming years, the state of Montana will continue aligning systems and programs to meet the strategic and programmatic goals outlined in this plan. The strategic goals were developed through collaboration with partners and stakeholders and build on successes and aim to overcome obstacles.

This WIOA Combined State Plan was jointly developed by one state team, guided by leadership from all of Montana's combined state plan programs. The strategic and operational planning elements were written with input from the state's team, while program-specific requirements were written by each program and shared for vetting with the state team.

## II. Strategic Elements

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs.

### a. Economic, Workforce, and Workforce Development Activities Analysis

The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate.

#### 1. Economic and Workforce Analysis

##### A. Economic Analysis

The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State. This must include—

##### i. Existing Demand Industry Sectors and Occupations

Provide an analysis of the industries and occupations for which there is existing demand.

##### ii. Emerging Demand Industry Sectors and Occupations

Provide an analysis of the industries and occupations for which demand is emerging.

### iii. Employers' Employment Needs

With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

Montana's economic trend has been positive, but with growth limited by a tight labor market. Employment levels have posted steady growth since the 2007 recession, slowly reducing the unemployment rate to sub-normal levels.[1] Currently, Montana is experiencing worker shortages in all industries and regions (although some counties and reservations have higher unemployment rates, detailed later). Labor conditions have tightened sufficiently for businesses to notice, and employment growth has slowed due to insufficient worker supply. GDP and personal income growth have continued due to improvements in productivity, although growth is slower than it would be with an unrestrained labor supply.[2] Montana's workers have experienced large gains in household income and personal income during this sustained economic expansion.[3]

The tight labor market in Montana has been the overarching constraint across all regions and industries for several years. The tight labor market has been caused by the retiring baby-boomer population and relatively few young adults, combined with steady employment growth.[4] Although Montanans have higher labor force participation rates, higher rates of second job-holding, and higher rates of working past the age of 65 than the national average, the state's population is also older than the national average.[5] Given Montana's more prosperous path through the 2007 recession, tight labor markets have limited Montana's growth since mid-2014, much earlier than tight labor conditions appearing across other states.[6]

However, these demographic changes and labor force size have been the focus of extensive prediction models, informational outreach, and workforce development efforts for over ten years.[7] The programs designed and implemented by the Montana Department of Labor & Industry and Governor Bullock's Administration have had a goal of increased engagement of workers, such as increasing the supply of female workers through the efforts of the Equal Pay for Equal Work Task Force, and allowing students to fill worker need while enhancing their education through work-based learning and apprenticeship programs. When our private sector partners started to feel the strain of finding well-trained workers, the Department was already a step ahead, leading the way with tested programs to assist. Now, the Department has effective partnerships with private and education sector partners, helping the state achieve its full workforce potential.

As mentioned, there are some areas of the state with lagging economies. A few rural counties in the northwest corner of Montana faced large job losses during the 2007 recession, and have struggled to regain footing. However, rapid job growth in the more populated northwest counties (specifically Flathead and Lake) has kept the region on the right path, slowly bringing unemployment rates to normal levels.[8] One of the impacted northwest counties, Glacier County (and the overlapping Blackfeet Indian Reservation) have also faced setbacks with repeated federal government shutdowns. This traditionally high-poverty reservation counts on federal jobs in Glacier National Park to provide seasonal employment opportunities.

In addition to the rural areas in Northwest Montana, lower demand for coal and coal-fired power has caused instability in Big Horn and Rosebud Counties (and the overlapping Crow and Northern Cheyenne Indian Reservations). These counties are likely to continue to suffer losses in labor income with anticipated power plant closures and the related decline in secondary and tertiary industries.[9] The Department has been active in economic development planning and diversification efforts for these coal-impacted regions using funding from a POWER grant and other state and private sources.

With a growing retirement population, healthcare, leisure activities, and construction are expected to be the fastest growing industries in Montana through 2027. These jobs are concentrated in the more populated regions in Montana, with construction workers most needed in the rapidly growing Bozeman region. Mining and utility employment is expected to decline in the next ten years, largely due to the closure of several coal-fired power plants in Eastern Montana, and continued low natural gas prices providing a cheaper fuel source than oil or coal. The information industry, particularly news



media is also expected to continue its decline due to consolidation and greater competition from online news sources.

However, with roughly 1/5 of the state's workforce expected to retire in the next ten years, nearly all industries and occupations have unmet worker demand. The demand from employers for worker training and assistance with planning has never been higher. Therefore, priority is often where public-sector involvement provides the most value. For example, while occupations related to food preparation, sales, and office and administrative support are projected to have the most job openings through 2027, these jobs often can be filled with workers with minimum education and training.[10] Workforce training efforts are therefore targeted towards higher-paying, higher-skill occupations. Occupations requiring postsecondary education that are also projected to have a large amount of job openings include a variety of healthcare occupations (registered nurses, nursing assistants, licensed practical and licensed vocational nurses, medical assistants, and dental assistants), several business-related occupations (accountants and auditors, bookkeeping clerks, and business operations specialists), teachers, computer user support specialists, social workers, heavy and tractor-trailer truck drivers, and automotive service technicians and mechanics.

With the cooperation of the Montana University System, including the two-year colleges, and several private educational institutions, the Department has conducted a supply and demand analysis to identify areas where the existing supply of workers exiting Montana's post-secondary education system is insufficient to meet labor demand. The areas with the greatest need include nursing and dental assistants, automotive service techs, paralegals and legal assistants, human resource specialists, medical & clinical laboratory technologists, occupational therapists, and several computer and information technology occupations.[11]

The Department has also worked to utilize the Registered Apprenticeship Program because many of the construction and information technology jobs most in demand are apprenticeable. Apprentices completing Montana's Registered Apprenticeship Programs also earn wages \$20,000 more than Montana's average annual wage, suggesting that expanding program participation would also help increase wage income in the state.

Specific occupations related to the Bozeman high-tech industry (including biomedical manufacturing and photovoltaics) include computer user support specialists, application software developers, electrical and electromechanical assemblers, software developers, management analysts, biological technicians, electrical and electronics engineering technicians, electrical engineers, microbiologists, and other occupations. In addition, the growing high-tech industry requires several support occupations that are common to all industries, such as customer service representatives, sales representatives, office clerks, sales representatives, and market research analysts.

Brewers are the most in-demand occupation needed in beverage manufacturing. The Montana Registered Apprenticeship Program has an existing program for brewer apprentices, and has had considerable support from the state's breweries in using the program to meet their labor demand.

Throughout the economy, employers are expecting workers to be well-trained in technical skills prior to hire, and are requesting more work-based training to provide students with work experience during the schooling years. Roughly 20% of Montana's current workforce is expected to retire in the next ten years, keeping work-based experience at the top of the list for in-demand skills and abilities.[12]

Overall, the most common skill needed now and in future Montana jobs is active listening, and the most common soft skill needed is low levels of service orientation. However, the current workforce already demonstrates those skills, and the skill requirements are not expected to significantly change in the next ten years.

Within the trades occupations, employers are seeking workers with prior hands-on training. Many mechanics, welders, and other positions require employer-specific credentials that can only be obtained through the employer. However, prior post-secondary training or associate degree attainment can assist in faster employee training once hired. Construction-related employers require

both skilled workers, typically trained through associate degrees, certification programs, or apprenticeship, and unskilled laborers and helpers. Demand for the construction field is filled primarily through apprenticeships and career and technical education.

Healthcare is Montana's largest private employing industry and requires large numbers of workers each year to fill openings. Healthcare jobs typically require higher levels of education and training, but home health and personal care aides can be trained using career and technical education at the high school level.

The professional services industry is also a fast-growing industry in Montana, and is expected to maintain this pace in the next ten years. Jobs in the professional services industry are typically bachelor's degree or above, creating job demand at all education levels in Montana.

[1] Local Area Unemployment Statistics, Montana Department of Labor & Industry.

[2] Wagner et al, 2018 Labor Day Report. Montana Department of Labor & Industry. Available at <http://lmi.mt.gov/Publications/PublicationsContainer/labor-day-report-montana-2018>.

[3] Median household income growth, American Community Survey 1-year estimates, U.S. Census Bureau, and personal income from Bureau of Economic Analysis, U.S. Department of Commerce.

[4] Wagner et al, 2018.

[5] American Community Survey, U.S. Census Bureau. Current Population Survey, Bureau of Labor Statistics, U.S. Department of Labor.

[6] Local Area Unemployment Statistics, Montana Department of Labor & Industry, and Current Population Survey, Bureau of Labor Statistics, U.S. Department of Labor.

[7] See annual Labor Day reports since 2008. Available at [lmi.mt.gov/Publications](http://lmi.mt.gov/Publications).

[8] Local Area Unemployment Statistics.

[9] Wagner et al, 2018.

[10] Klungtvedt, 2018. Montana Employment Projections, 2017-2027: Labor Force and Employment Growth.

[11] For full list of undersupplied occupations and programs, please see Watson et al, 2017. "Meeting State Worker Demand: A Report on the Labor Market Outcomes of Montana Colleges" available at <http://lmi.mt.gov/Publications/PublicationsContainer/meeting-state-worker-demand>.

[12] Calculation by Montana Department of Labor & Industry (DLI) using 2017 American Community Survey 1-year estimates for workers by age along with DLI labor force forecasts for future labor force participation rates.

## B. Workforce Analysis

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA<sup>4</sup>. This population must include individuals with disabilities among other groups<sup>5</sup> in the State and across regions identified by the State. This includes—

[4] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the

Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals.

[5] Veterans, unemployed workers, and youth, and others that the State may identify.

## i. Employment and Unemployment

Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

## ii. Labor Market Trends

Provide an analysis of key labor market trends, including across existing industries and occupations.

## iii. Education and Skill Levels of the Workforce

Provide an analysis of the educational and skill levels of the workforce.

## iv. Skill Gaps

Describe apparent 'skill gaps'.

Montana's labor force continues to grow slowly, despite the large retirements from the baby boomer population, due to in-migration of about 8,000 workers annually and increasing labor force participation rates for older workers and women. Even with this growth, the unemployment rate continues to tick downward, currently at a very low level below 3.5%. Employers are hiring workers as soon as they can find them.

Montana's labor force participation rates are trending downwards because of the higher shares of people 65 years and older in the state. The labor force participation rate for those over 16 years of age is slightly lower than the national average at 62.3% in 2018. However, the participation rates among age and gender subgroups are almost all higher in Montana than in the U.S., suggesting that the lower labor force participation rate in Montana is due to demographics of an older population, not due to cultural or economic factors. In particular, Montana women have a much higher labor force participation rate than women nationally, with 78% of Montana women over 16 in the labor market compared to only 75% nationally in 2018.[1]

Montana's overall labor force participation rate is expected to continue to decline over the next ten years due to continued retirements of the baby boomer population. The labor force is expected to continue to grow slowly at about 3,600 people per year, which includes the roughly 8,000 in-migrants into Montana's labor force each year. At this pace, unemployment rates will continue to be quite low and job growth will be restricted. Worker shortages are expected to ease after 2025.[2]

### INDIVIDUALS WITH BARRIERS:

Roughly 32,000 Montana workers have a disability, with the most common types of disabilities being hearing difficulty or cognitive difficulty. Another 17,300 disabled Montanans are unemployed, at an unemployment rate for disabled Montanans of 3.5%.[3] Cognitive disability is the most common disability among unemployed Montanans. Finally, roughly 35,000 Montanans with a disability are not in the labor force, representing a sizeable untapped labor pool. The most common disability among those not in the labor force is an ambulatory difficulty (19,000 Montanans), followed by cognitive difficulty and independent living difficulty (about 16,500 Montanans in each category).

### CHARACTERISTICS OF THOSE NOT IN THE LABOR FORCE:

Over 60% of Montana's non-working population over 16 are retired. Other common reasons are having a disability or illness (15% of nonworking Montanans), taking care of family (11%), or attending school or other training (11%). Only 3.5% provide other reasons for not being in the labor force, including mental illness, lack of transportation, previous felony or misdemeanor conviction, lack of housing, domestic violence, or lack of economic opportunity.[4]

## LABOR MARKET TRENDS:

Given the low unemployment rate and over ten years in the current economic expansion, all industries and occupations are experiencing the effects of the labor market shortage. Given the large labor demands from healthcare and construction, along with the need for medium-term technical and practical training in these careers, workforce training efforts from Montana's workforce and education organizations often focus on training workers for jobs in nursing and construction.

## EDUCATION AND SKILL LEVELS OF THE WORKFORCE:

Montana's workforce is well-educated, having the third highest share of the population with a high school diploma or equivalency among states in 2017.[5] Roughly 65% of Montana's population has some type of post-secondary education, ranking 13th in the nation. However, only about 40% of Montana's population have a post-secondary diploma or certification, leaving a large population of Montana workers just a few steps away from completing their training.[6]

Using Montana Department of Labor & Industry employment forecasts through 2028 and the Bureau of Labor Statistics minimum training requirements, the number of jobs requiring some post-secondary training will increase by 1% over the next ten years. Roughly 16,000 more jobs will be created in Montana over the next ten years that require some level of post-secondary training. The number of jobs at the high school diploma level and below will increase by nearly 23,000 jobs, but the share of jobs in the economy at this skill level will decrease by roughly 1%.

## SKILLS GAPS:

Using the 35 skills identified by O\*Net and Montana Department of Labor & Industry employment forecasts, there are unlikely to be large skill gaps at the macroeconomic level in Montana in the next ten years. Although future jobs are likely to require more science skills and less skill in instruction, the average skill score required in the economy ten years from now is not statistically different from the current skill level.[7]

However, the Department has conducted recent analysis on gaps between the demand for workers from Montana employers compared to the supply of workers exiting Montana's college system. This analysis identified that the state needs more social workers and workers trained in information technology.[8]

[1] Bureau of Labor Statistics, Current Population Survey, 2018.

[2] Montana Department of Labor & Industry labor force forecasts.

[3] 2017 ACS 1-year estimates, U.S. Census Bureau.

[4] Klungtvedt, Emily. May 2019. "Where are the Workers? Understanding Montana's Labor Force Participation Rate" Montana Economy at a Glance. Available at <http://lmi.mt.gov/Portals/193/Publications/LMI-Pubs/Articles/2019/0519-LaborForceParticipation.pdf>.

[5] 2017 American Community Survey 1-year estimates, U.S. Census Bureau.

[6] Ibid.

[7] Skills analysis compares the mean level score across all occupations in 2018 compared to 2028. Only level scores with a corresponding importance score of 3 or higher were included in the weighted average. Confidence interval used for statistical tests was 95%.

[8]

## 2. Workforce Development, Education and Training Activities Analysis

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

## A. The State's Workforce Development Activities

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required <sup>6</sup> and optional one-stop delivery system partners.<sup>7</sup>

[6] Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

[7] Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

## B. The Strengths and Weaknesses of Workforce Development Activities

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

## C. State Workforce Development Capacity

Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A), above.

### A. STATE WORKFORCE DEVELOPMENT ACTIVITIES

The state of Montana coordinates activities across partners to meet workforce needs throughout the state. The following state agencies coordinate statewide workforce development activities:

- Montana Department of Labor & Industry (DLI):
  - Adult (WIOA Title I);
  - Youth (WIOA Title I)
  - Dislocated Worker (WIOA Title I);
  - Wagner Peyser (Wagner-Peyser Act, as amended by WIOA Title III);
  - Senior Community Service Employment Program (SCSEP) (Title V of the Older American Act);
  - Trade Adjustment Assistance for Worker Programs (Chapter 2, Title II of the Trade Act);
  - Jobs for Veterans State Grants (Title 38, Chapter 41); and
  - Migrant and seasonal Farmworker Program (WIOA Title I)

- Office of Public Instruction (OPI):
  - Adult Education and Family Literacy (AE) (WIOA Title II)
- Department of Public Health and Human Services (DPHHS):
  - Vocational Rehabilitation (Title I Rehabilitation as amended by WIOA Title IV); and
  - Temporary Assistance for Needy Families (TANF)
- Office of the Commissioner of Higher Education
  - Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

All programs and partners coordinate regionally through the state's one-stop system. Each program also uses labor market information (LMI) to develop regional strategies for training and workforce development. In addition to the use of LMI to develop training priorities and help customers using the one-stop system, the state maintains a comprehensive Eligible Training Provider List (ETPL) that is used by all Title I WIOA service providers across the state. The ETPL provides customers information on program description, the cost of the program, additional fees for the training program, program credits and hours, and wage and program success for customers.

The state's vocational rehabilitation program uses LMI for all cases during the process of developing the vocational objective for the individualized plan for employment as a tool to help the customer make an informed choice in their career plan. In addition, LMI is also referred to when the consumer shows interest in changing their vocational objective. Vocational rehabilitation also uses LMI with many of the pre-employment transition services (PreETS) provided to students aged 14-21 that are currently enrolled in an education program for career exploration.

Adult Education programs throughout the state also use LMI to assist students in career exploration and goal setting toward their path to employment or higher education. In addition, Adult Education programs use LMI to coordinate with required partners and additional regional partners to develop curriculum and integrated education and training opportunities to meet workforce needs.

The State Workforce Innovation Board (SWIB) ensures that workforce activities are aligned with economic development, education, workforce development, government, and business stakeholders at the local and state level. This multifaceted alignment of public and private stakeholders creates a workforce system that is data and demand-driven, flexible, and responsive to the needs of Montanans.

The SWIB oversees Montana's one-stop system and directs the workforce activities at the community level through policy and guidance on workforce programs. Workforce activities are customized to fit the needs of individual customers – both business customers and jobseekers. The partnerships and collaboration guided by state agencies and the SWIB form a fully integrated workforce system comprised of both core and non-core program partners and community stakeholders that coordinate to provide impactful services and activities throughout the state.

The SWIB is tasked with procuring a one-stop operator for the operation and oversight of Montana's one-stop system in accordance with WIOA 121(d). The SWIB prioritizes the coordination of services with both core and non-core partners at the community level to ensure the best service delivery to customers. The state of Montana works continuously to improve program integration across partners through regular meetings with partners at Community Management Team meetings, training, data integration, and development of common intake processes.

## B. STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT

Montana is a geographically large, industry-diverse state. The rural nature of Montana poses unique challenges and opportunity for workforce development, coordination of services, and business engagement. Locally-driven initiatives are where we see the greatest successes throughout the

state. Workforce program administrators throughout the state are coordinating at regional and community levels through participation on community management teams, designed to coordinate services and develop regional workforce development strategies.

In Montana's urban areas there are more opportunities and resources to build strong, coordinated, community-based partnerships to meet local workforce needs. In most urban areas throughout the state partnerships include economic development associations, K-12 education, post-secondary education, coordinated employer networks, and other non-governmental organizations that work together to develop large systems and create buy-in from stakeholders to meet current and future workforce challenges.

Rural areas throughout the state, which have challenges, are also hubs of innovation. Many of the rural areas lack resources and infrastructure; however, rural areas are looking at ways to coordinate at the community level and leverage regional relationships to develop innovative ways to meet workforce and economic development challenges. All core partners are required to serve and coordinate in rural areas, and successful service delivery is reliant on local relationships and additional partnerships.

Notable best practices occurring throughout the state include, but aren't limited to:

- Partnerships with K-12 and post-secondary education, particularly with coordination around Perkins career and technical education, work-based learning, training mid-career workers, and serving adult learners;
- Developing tools to ensure partners can use labor market information to develop demand-driven workforce programs and provide meaningful training for individuals within the public workforce system;
- Establishing technical apprenticeship curriculum, like healthcare and IT, in coordination with two year and community colleges across the state; and
- Establishing a platform for a data sharing warehouse.

The state of Montana continues to improve service delivery across partners to ensure customers are able to navigate the services within the system and program referrals are seamless for customers. Additional cross-training for providers is occurring to help with service delivery; however, the rural nature of the state continues to make service delivery challenging in some areas.

### C. STATE WORKFORCE DEVELOPMENT CAPACITY

Workforce development is a priority for the state of Montana and the state continues to partner across agencies to develop an effective workforce system. Governor Steve Bullock and leadership from across the state are committed to the evaluation and continuous improvement of Montana's education and workforce systems to ensure partners coordinate services, and understand the state's workforce needs and challenges. In addition to the SWIB, which has representation from across agencies and industries, Governor Bullock regularly convenes cabinet members and elected officials to develop specific strategies and provide leadership for the state to meet workforce challenges.

- Technical assistance to regional stakeholders around sector partnerships and strategies;
- Facilitation of statewide business engagement training for all core partners, industry, education, and economic entities from across the state;
- Cross training across core partner programs to increase programmatic understanding and improve client services and case management;
- Increased collaboration and client services at the community level within Community Management Teams;

- Increased understanding and coordination across partners and industry to grow work-based learning opportunities across the state;
- Development of a shared labor market information tool for career and technical education, economic development, and other partners;

In addition to ongoing efforts to engage partners and provide meaningful training and collaboration opportunities the state of Montana is beginning the following collaborative projects to better serve customers across the state:

- Coordinating with industry, education, and workforce partners to understand and map credentials across agencies;
- Deepen and strengthen relationships with economic development partners to ensure workforce development efforts align with economic growth strategies;
- Collaborate with industry and health and human services partners to serve Medicaid participants;
- Continue working with education partners to deepen understanding and awareness about career and technical education in secondary and post-secondary institutions;
- Continue partnering with Vocational Rehabilitation and Blind Services on strategic business engagement on behalf of clients with disabilities; and
- Development of an integrated case management system with common intake and an automated referral process to best serve all clients using the public workforce system.

## b. State Strategic Vision and Goals

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—

### 1. Vision

Describe the State's strategic vision for its workforce development system.

### 2. Goals

Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include—

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment<sup>8</sup> and other populations.<sup>9</sup>

(B) Goals for meeting the skilled workforce needs of employers.

[8] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.



[9] Veterans, unemployed workers, and youth and any other populations identified by the State.

### 3. Performance Goals

Using the tables provided within each Core Program section, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

### 4. Assessment

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment and other feedback to make continuous or quality improvements.

#### 1. VISION

Montana's workforce and talent development system will continue delivering data-driven services and provide opportunities for its current and future workforce and businesses to sustain economic viability through partnerships and collaboration. Partners within the public workforce system will integrate service delivery, use data analysis, and review and evaluate programs to continuously improve services across the state.

#### 2. GOALS

##### Access:

The state of Montana is committed to designing a public workforce and talent development system that is programmatically and physically accessible to all Montanans, including youth and those with barriers to employment. The state continues working on and prioritizing service delivery, cross training, and the development of deeper understanding of all workforce and education programs to ensure that all those served receive the resources, training, education, and support needed to succeed in Montana's economy.

##### Alignment:

The state of Montana is aligning and cross-training on programs to ensure that all customers of Montana's workforce system experience seamless service delivery. Coordination and alignment of service ensures that resources are braided and used to best serve customers efficiently. Moving forward, the state of Montana will continue to focus on additional program alignment through system integration to ensure that all staff servicing clients have the necessary information to understand a holistic picture of the customer.

##### Accountability:

Montana's workforce programs will have successful outcomes that provide clients with access to meaningful training and employment services to succeed in Montana's economy. Montana's workforce and training programs will continue to adapt and evolve to ensure programs are flexible and responsive to changing economic conditions and client services will continue to be measured based on outcomes and goals set by law and the SWIB.

##### Access:

Montana's public workforce system will coordinate employer engagement across sectors throughout the state to ensure workforce needs are understood and the workforce system is responsive to those needs. In addition, coordinated employer engagement will ensure that employers understand the services designed to support talent recruitment, development, and retention.

Alignment:

The state of Montana will align business services across core partners and others to ensure that all businesses that engage with workforce, education, and training providers receive similar information about services and programs targeted to support workforce and talent development. In addition, the state of Montana will develop an education strategy for partners on the assessment of data to understand business cycles and proactively assist businesses and help with layoff aversion before a rapid response event. Cross training on programs, ongoing partner engagement, and system enhancement will foster consistency and allow for meaningful business engagement across the state.

Accountability:

To ensure Montana's workforce programs are effectively serving Montana businesses, Montana's public workforce and talent development system will continue cross training on programs and seeking opportunities for additional partnerships and collaboration. The state will ensure that business engagement tracking and accountability is built into systems to measure effectiveness and seek opportunities for improvement.

### 3. PERFORMANCE GOALS

#### TITLE I - ADULT PROGRAM

	PROGRAM YEAR 2020 EXPECTE D LEVEL	PROGRAM YEAR 2020 NEGOTIATE D LEVEL	PROGRAM YEAR 2021 EXPECTE D LEVEL	PROGRAM YEAR 2021 NEGOTIATE D LEVEL
EMPLOYMEN T (SECOND QUARTER AFTER EXIT)	71.0%	71.0%	71.0%	71.0%
EMPLOYMEN T (FOURTH QUARTER AFTER EXIT)	73.1%	73.1%	73.1%	73.1%
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	\$5,913	\$5,913	\$5,913	\$5,913
CREDENTIAL ATTAINMENT RATE	53.0%	53.0%	53.0%	53.0%
MEASURABLE SKILL GAIN	Baseline	Baseline	Baseline	Baseline

#### TITLE I - DISLOCATED WORKER PROGRAM

	PROGRAM YEAR 2020 EXPECTE D LEVEL	PROGRAM YEAR 2020 NEGOTIATE D LEVEL	PROGRAM YEAR 2021 EXPECTE D LEVEL	PROGRAM YEAR 2021 NEGOTIATE D LEVEL
EMPLOYMEN T (SECOND	75.0%	75.0%	75.0%	75.0%

	PROGRAM YEAR 2020 EXPECTE D LEVEL	PROGRAM YEAR 2020 NEGOTIATE D LEVEL	PROGRAM YEAR 2021 EXPECTE D LEVEL	PROGRAM YEAR 2021 NEGOTIATE D LEVEL
QUARTER AFTER EXIT)				
EMPLOYMEN T (FOURTH QUARTER AFTER EXIT)	71.0%	71.0%	71.0%	71.0%
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	\$7,000	\$7,000	\$7,000	\$7,000
CREDENTIAL ATTAINMENT RATE	53.0%	53.0%	53.0%	53.0%
MEASURABLE SKILL GAIN	Baseline	Baseline	Baseline	Baseline

TITLE I - YOUTH PROGRAM

	PROGRAM YEAR 2020 EXPECTE D LEVEL	PROGRAM YEAR 2020 NEGOTIATE D LEVEL	PROGRAM YEAR 2021 EXPECTE D LEVEL	PROGRAM YEAR 2021 NEGOTIATE D LEVEL
EMPLOYMEN T (SECOND QUARTER AFTER EXIT)	60.1%	60.1%	60.1%	60.1%
EMPLOYMEN T (FOURTH QUARTER AFTER EXIT)	59.0%	59.0%	59.0%	59.0%
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	Baseline	Baseline	Baseline	Baseline
CREDENTIAL ATTAINMENT RATE	59.0%	59.0%	59.0%	59.0%
MEASURABLE SKILL GAINS	Baseline	Baseline	Baseline	Baseline

TITLE II - ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM

	PROGRAM YEAR 2020 EXPECTE D LEVEL	PROGRAM YEAR 2020 NEGOTIATE D LEVEL	PROGRAM YEAR 2021 EXPECTE D LEVEL	PROGRAM YEAR 2021 NEGOTIATE D LEVEL
EMPLOYMEN T (SECOND QUARTER AFTER EXIT)	50%	Baseline	51%	Baseline
EMPLOYMEN T (FOURTH QUARTER AFTER EXIT)	30%	Baseline	31%	Baseline
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	Not Applicable	Baseline	Not Applicable	Baseline
CREDENTIAL ATTAINMENT	22%	Baseline	23%	Baseline
MEASURABLE SKILL GAINS	54%	Baseline	55%	Baseline

#### TITLE III - WAGNER-PEYSER ACT EMPLOYMENT SERVICE PROGRAM

	PROGRAM YEAR 2020 EXPECTE D LEVEL	PROGRAM YEAR 2020 NEGOTIATE D LEVEL	PROGRAM YEAR 2021 EXPECTE D LEVEL	PROGRAM YEAR 2021 NEGOTIATE D LEVEL
EMPLOYMEN T (SECOND QUARTER AFTER EXIT)	71.0%	71.0%	71.0%	71.0%
EMPLOYMEN T (FOURTH QUARTER AFTER EXIT)	67.0%	67.0%	67.0%	67.0%
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	\$5,134	\$5,134	\$5,134	\$5,134
CREDENTIAL ATTAINMENT RATE	Not Applicable	Not Applicable	Not Applicable	Not Applicable
MEASURABLE SKILL GAINS	Not Applicable	Not Applicable	Not Applicable	Not Applicable

#### TITLE IV - VOCATIONAL REHABILITATION PROGRAM

	PROGRAM YEAR 2020 EXPECTE D LEVEL	PROGRAM YEAR 2020 NEGOTIATE D LEVEL	PROGRAM YEAR 2021 EXPECTE D LEVEL	PROGRAM YEAR 2021 NEGOTIATE D LEVEL
EMPLOYMEN T (SECOND QUARTER AFTER EXIT)	Baseline	Baseline	Baseline	Baseline
EMPLOYMEN T (FOURTH QUARTER AFTER EXIT)	Baseline	Baseline	Baseline	Baseline
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	Baseline	Baseline	Baseline	Baseline
CREDENTIAL ATTAINMENT RATE	Baseline	Baseline	Baseline	Baseline
MEASURABLE SKILL GAINS	43%	Not Applicable	44%	Not Applicable

#### 4. ASSESSMENT

Montana's core WIOA programs continue assessing effectiveness using the WIOA Primary Indicators of Performance. In addition, the SWIB set additional performance goals to ensure Montana continues to improve its processes to better serve clients using the public workforce system.

The state of Montana continues to provide leadership at the state level. Agencies are better aligned and offering better guidance to those providing direct services to clients across programs. In addition, the state of Montana continues reviewing data and collaborating with economic development, education, and additional community partners to ensure that the public workforce system is responsive to employment needs and that alignment between education, training and talent development continues to meet those challenges.

Montana's SWIB will assess the public workforce system and partner programs using performance data gathered and presented to the board and seek additional input from statewide stakeholders and implementation of promising practices in other states. The SWIB will work with the one-stop operator to seek opportunities for continuous improvement of the public workforce system and additional opportunities to braid state and federal funding to best support clients using programs administered through the one-stop system.

### c. State Strategy

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

**1. Describe the strategies the State will implement, including industry or sector partnerships related to in-**

demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). “Career pathway” is defined at WIOA section 3(7) and includes registered apprenticeship. “In-demand industry sector or occupation” is defined at WIOA section 3(23)

2. Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2)

1. The state of Montana will continue expanding sector strategies to continue enhancing and strengthening its economic vitality by addressing employer and job-seeker talent requirements. Sector partnerships are an important component of coordinating services and integrating resources to design a public workforce and talent development system that’s responsive to key industries throughout the state.

Montana will continue using LMI as the basis to map and assess current industry clusters and develop statewide strategies to engage industry and understand the skills required to meet current and future workforce challenges. The state of Montana will continue to provide training to regional partners on business engagement and work on coordinating across partners to develop industry-specific regional workforce and talent development strategies.

In an effort to better track business services and engagement, Montana’s Department of Labor & Industry is developing an integrated case management system that will allow all core partners the ability to track business engagement and provide consistent data alignment.

In addition to aligning core partners to best serve industry and develop meaningful sector partnerships across the state, sector partnerships must also closely align with education systems to develop flexible and responsive career pathways. Perkins V reauthorization will allow the public workforce and talent development system to better coordinate with both secondary and post-secondary education partners across the state. As required under Perkins V, the state’s career and technical education (CTE) programs will also use LMI to design CTE coursework to ensure that coursework and training are aligned with the labor market.

Sector partnerships and industry engagement have helped the state of Montana develop its career pathways and training programs to ensure that WIOA clients, students, and learners at every level have the training, education, and skills to enter into meaningful employment. The state will continue partnering at the state and local level to develop training and education opportunities and

programmatic alignment to ensure that all those served through the workforce or education systems receive the training and preparation they need to successfully transition into the workforce.

2.

- Technical assistance to regional stakeholders around sector partnerships and strategies;
- Facilitation of statewide business engagement training for all core partners, industry, education, and economic entities;
- Cross training across core partner programs to increase programmatic understanding and improve client services and case management;
- Increased collaboration and client services at the community level within Community Management Teams;
- Increased understanding and coordination across partners and industry to grow work-based learning opportunities across the state;
- Development of a shared labor market information tool for career and technical education, economic development, and other partners;

In addition to ongoing efforts to engage partners and provide meaningful training and collaboration opportunities the state of Montana is beginning the following collaborative projects to better serve customers across the state:

- Coordinating with industry, education, and workforce partners to understand and map credentials across agencies;
- Deepening and strengthening relationships with economic development partners to ensure workforce development efforts align with economic growth strategies;
- Collaborating with industry and health and human services partners to serve Medicaid participants;
- Continue working with education partners to deepen understanding and awareness about career and technical education in secondary and post-secondary institutions;
- Continue partnering with Vocational Rehabilitation and Blind Services on strategic business engagement on behalf of clients with disabilities; and
- Development of an integrated case management system with common intake and an automated referral process to best serve all clients using the public workforce system.

The ongoing work listed above is part of the state's larger vision of a coordinated, aligned workforce and talent development system across partners to best serve all Montanans. The goals of access, alignment, and accountability are inclusive and are the underpinning of the overall strategic vision of one large system designed to serve all and meet Montana's workforce and talent challenges. In addition to the partners included in this plan, the state of Montana has a strong relationship with education institutions throughout the state and is invested in collaboration on talent development to ensure Montana's economy continues to grow and there is a well-educated and trained workforce to support that growth.

### III. Operational Planning Elements

The Unified or Combined State Plan must include an Operational Planning Elements section that supports the State's strategy and the system-wide vision described in Section II(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include—

## a. State Strategy Implementation

The Unified or Combined State Plan must include—

### 1. State Board Functions

Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision making processes to ensure such functions are carried out).

The mission of Montana's State Workforce Innovation Board (SWIB) is to advise the Governor on statewide workforce development strategies that maximize the state's education, training, and employment resources in support of economic development. The board leads the state in broad strategic workforce initiatives that leverage resources beyond WIOA funding, while providing necessary system oversight.

Montana's State Workforce Innovation Board Chair is appointed by the Governor, and the board works through a committee structure designed by the board chair in consultation with staff. Committees include the Executive Committee, the WIOA Committee, and the Strategic Workforce Initiatives Committee. All three committees work on policy, WIOA implementation, and the strategic vision for the role of the public workforce and training system in Montana.

In addition, the board oversees the State Registered Apprenticeship Council as an ad hoc committee. The role of the State Registered Apprenticeship Council is to advise the state's registered apprenticeship program on best practices and help the program meet its goals for registered apprenticeship.

The board also assembles ad hoc committees to work on topic-specific issue recommendations from the Governor and established priorities of the SWIB.

The board conducts two in-person meetings per year, typically taking place in the fall and spring. Additional meetings are convened by the chair in consultation with the Director of the SWIB and the Commissioner of Labor & Industry. Committee and task force meetings use electronic communication. Meeting notes are posted on the State Workforce Innovation Board website at [swib.mt.gov](http://swib.mt.gov).

The SWIB meets its functions under section 101(d) of WIOA by doing the following:

- - Making policy recommendations for the governor related to the establishment and maintenance of an efficient, integrated, statewide workforce development system to train the maximum number of unemployed and underemployed Montanans as possible;
  - Leading the strategic planning process for an integrated workforce development system, in consultation with community management teams and local workforce organizations outside the state's workforce development system;
  - Creating performance standards that identify effective workforce development initiatives;
  - Coordinating the state's workforce innovation initiatives with the state's economic development plan;
  - Promoting a system of workforce development that responds to the lifelong learning needs of Montana's workforce;



- Encouraging public-private partnerships and facilitating innovations in workforce development policy and practices including local workforce organizations outside the State's Workforce Development System;
- Reviewing local adult education proposals to offer recommendations for workforce alignment;
- Ensuring a quality workforce system by evaluating results and supporting high standards and continuous improvement; and
- Coordination with organizations outside its Workforce Development System for opportunities to support local, business engaged, innovative workforce programs.

SWIB is implementing the following to ensure it meets its priorities as listed above

- - SWIB's standing committees include the following and the board adds committees and evaluates its structure and subcommittee work on an ongoing basis:
    - Executive Committee:
      - The committee will be composed of a majority of business members, but shall include the Governor or their designee, and the cabinet officer from the Department of Labor & Industry. This committee may also include the cabinet officers from other relevant state departments responsible for workforce development initiatives.
      - This committee will have the authority of the SWIB when SWIB action is required.
      - Duties will include but are not limited to tracking workgroup plans and progress; offering leadership around the alignment of workgroups; offering leadership around leveraging system partners; and driving provisions of critical workforce data.
    - WIOA committee:
      - Is responsible for understanding and making decisions on WIOA rules and regulations; administering the state's "One-Stop" Certification Process; and coordinating and implementing the state plan.
    - Strategic Workforce Initiatives Committee: the committee will work on developing guidance and resources that are specific and have broad impacts on the workforce and talent development across the state.

## 2. Implementation of State Strategy

Describe how the lead State agency with responsibility for the administration of each core program or a Combined Plan partner program included in this plan will implement the State's Strategies identified in Section II(c). above. This must include a description of—

### A. Core Program Activities to Implement the State's Strategy

Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also, describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

- Data alignment;
- Cross training across partners; and
- Coordinated and strategic business engagement.

#### DATA ALIGNMENT:

All core programs use LMI to serve clients and ensure that training and career development strategies are aligned to industry needs in the area. The common use of LMI to serve businesses and individuals in Montana's public workforce and talent development system allows for seamless service delivery across programs to help individuals transition into training or employment and develop talent to support business and economic growth.

In addition to the common use of LMI, the state of Montana continues to design an integrated system to coordinate client and business service data within an integrated case management system. Integrated systems across partners will improve customer service delivery and further the development of a holistic case management approach that allows customers to move between programs seamlessly and will allow for additional braiding of funds across partners to meet individual customer needs. The integrated case management system will also improve business services across partners by allowing partners to track business engagement and work together to develop targeted engagement and better serve the businesses and industry in their area.

#### CROSS TRAINING ACROSS PARTNERS:

The state of Montana will continue providing training opportunities at the state and local level for partners to learn about partner programs and how the programs can work together to best serve clients in the public workforce and training system across the state. Cross training will build a better understanding of partner programs and allow for seamless service delivery across partners and ensure that programs aren't duplicating efforts across the system. In addition, a better understanding of core programs will allow partners to establish common goals, regionally, and strengthen relationships with other partners to better meet regional economic needs.

#### COORDINATED AND STRATEGIC BUSINESS ENGAGEMENT:

The state of Montana will continue growing its statewide business engagement strategy by coordinating across partners at the regional level to meet business challenges and ensure continued economic growth. In addition to tracking business services through the integrated case management system and using LMI to understand state and regional economies, the state of Montana will work on the following:

- Develop an education strategy for partners on the assessment of data to understand business cycles to proactively assist businesses and help with layoff aversion before a rapid response event;
- Grow sector strategies and partnerships at the state and regional level to identify skills, credentials, and education required for occupations within sectors; and
- Work collaboratively across partners to identify education and training partners that are able to work with clients to develop the skills and attain the training necessary to succeed in the workforce.

## B. Alignment with Activities Outside the Plan

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and

technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

The Montana Department of Labor & Industry (DLI) worked with the Office of Public Instruction (OPI) and the Office of the Commissioner of Higher Education (OCHE) to develop a dashboard to help Perkins-receiving institutions align career and technical education (CTE) programs to regional workforce demand. This dashboard was a direct response to Perkins V requirements for CTE program design. In addition, the dashboard is external-facing and will also help WIOA service providers assist clients with career exploration and training.

The state of Montana's registered apprenticeship program works closely with Montana University System's two-year and community colleges to design technical and education components of apprenticeship programs. The coordination between education partners and Montana's registered apprenticeship program allows the state to design modern apprenticeships and develop and expand pre-apprenticeships to meet employer needs in communities throughout the state. Because Montana's registered apprenticeship program continues to develop new in-demand apprenticeships, the apprenticeship model is becoming more appealing for students within a career pathway.

Due to Montana's tight labor market, employer engagement between education and workforce programs continues to grow as more employers are seeking innovative ways to meet their worker challenges. Work-based learning (WBL) models and integrating WBL into CTE programs across the state allows educators, students, and employers new ways to engage and learn on jobsites and in the classroom. Montana continues to develop guidance for educators and employers on WBL models and design meaningful experiences for students and adult learners. Growth in this area is allowing for meaningful coordination between programs at the state and local level.

The SWIB continues to support and require meaningful coordination of services and education partners to develop Montana has a well-trained workforce and ensure the state continues to grow economically. The SWIB funded the "Meeting State Worker Demand: A Report on the Labor Market Outcomes for Montana Colleges" report and closely reviewed its findings and continues to encourage the alignment between Montana's University System and Montana's Department of Labor & Industry, including WIOA programs. In addition, the board supported the submission of a waiver allowing Montana's University System to become eligible to receive WIOA funds and provide training through the Eligible Training Provider List (ETPL). The board receives regular updates on the implementation of Perkins V and Perkins V planning at its meetings and is committed to promoting CTE and WBL.

## C. Coordination, Alignment and Provision of Services to Individuals

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas. The activities described shall conform to the statutory requirements of each program.

Montana's core partners continue to strengthen relationships that benefit mutual customers across programs. Partners continue to align resources, promote efficiency and identify common customers. In addition, the state of Montana will continue working on cross training and deepening relationships across programs to ensure customers receive the most benefit from the public workforce and training development system.

Given Montana's small population and limited resources, it is necessary to coordinate services across partners to effectively serve all Montanans interacting with the public workforce system. Montana's Job Service offices, community-based organizations, AE, and VRBS are working at the state and local level to develop best practices and identify opportunities to continue alignment to meet

workforce challenges. In addition, TANF and SNAP programs partner with the workforce system to holistically serve clients enrolled in those programs.

Moving forward the state of Montana will continue to focus on coordination across partners to enhance services to individuals and meet its larger vision of a fully aligned workforce and talent development system. All partners within the public workforce system will:

- Participate in community-based initiatives and groups, in addition to the established community management teams, designed to collaborate and align public services to better serve customers;
- Participate in and collaborate on cross training across partners to deepen understanding of partner programs and how they serve clients; and
- Seek opportunities to strengthen local partnerships with education, economic development, local government, and other stakeholders to ensure services offered through the one-stop system are meeting the local workforce needs.

As stated above, in addition to coordination across WIOA partners, the state of Montana continues to align and coordinate workforce development with Montana's secondary and post-secondary education systems. Programmatic alignment is required under both WIOA and Perkins and DLI, OCHE, and OPI worked together to align the programs under the Perkins and WIOA umbrellas. In addition to programmatic alignment, the agencies are working together to promote and engage broad stakeholders in cultivating a better understanding of career and technical education and work-based learning as it impacts Montana students and businesses.

## D. Coordination, Alignment and Provision of Services to Employers

Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

Montana's WIOA partners continue to coordinate services to employers and work together to meet the workforce needs of the state. Montana will continue building on its successes with sector partnerships and coordinated engagement by expanding relationships with business associations, chambers of commerce, economic development entities, and additional statewide and local partners to ensure the services provided within the public workforce system support talent recruitment, development, and retention across the state.

The state also promotes community colleges, two-year colleges, and tribal colleges as essential local and regional suppliers of Montana's trained workforce. Increasing the involvement of employers in formal curriculum development and supporting continued expansion of comprehensive two-year education, with a focus on workforce development, access and academic progression is a critical component of Montana's talent development system.

Work to increase alignment across programs and develop consistent tracking accountability through system development will help programs develop strategic business and industry engagement across sectors. The state remains committed to developing an efficient, effective, and responsive delivery system for education and training programs designed to meet the needs of employers across the state. The state will continue promoting success through alignment by:

- Developing and implementing a statewide policy framework to align programs serving the needs of training providers, educational institutions, and employers;
- Supporting and partnering with the Montana University System's to enhance coordination between employers and education systems;

- Better understanding Montana's credential system and ensure that credentials offered through the university system and other training providers are meaningful to business and industry;
- Increasing alignment with economic development entities and collaborating on shared initiatives, promotion of new businesses, and support of entrepreneurship;
- Alignment of programs to meet local and unique training needs of in-demand industry occupations; and
- Seeking additional partnerships with organizations outside the workforce and talent development system to support local, employer-engaged, innovative talent development programs.

## E. Partner Engagement with Educational Institutions

Describe how the State's Strategies will engage the State's community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

- Perkins V and the integration of LMI as a tool to develop education curriculum within CTE programs at both the secondary and post-secondary level;
- Curriculum development for technical apprenticeships coordinated between the state's registered apprenticeship program, employers, and two-year or community colleges;
- 
- Collaboration between Adult Education and two-year and community colleges to develop pathways for adult learners; and
- Collaboration between DLI, OPI, OCHE, and industry representatives to navigate the current landscape of certifications across the state and ensure that training provided and certificates issued through Montana's university system or other training providers are relevant to industry.

Leadership within the public workforce system and the university system are committed to serving all Montanans, and the state of Montana recognizes higher education as one of the cornerstones of workforce training and talent development to ensure Montana continues to prosper and have a talented, trained, and educated workforce.

## F. Partner Engagement with Other Education and Training Providers

Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

The state of Montana's Eligible Training Provider List (ETPL) is part of an overall strategy to ensure informed customer choice for training, performance accountability, and continuous improvement in education and training. All partners use the ETPL for guiding clients through education and training options. The ETPL includes training providers whose performance qualifies them to receive WIOA funding to train individuals using the public workforce and talent development system.

Montana's registered apprenticeship program continues to grow and is uniquely poised to meet industry-specific workforce development needs through the development of curriculum and rigor of

training. As such, Montana's registered apprenticeship programs have the option for automatic placement on the ETPL.

The state's Adult Education program contracts for education and training services to bring research-based activities that support adult learners in content areas and workforce learning activities. Program data informs the state on promising instructional practices and effective instructional strategies. The state shares information about models and promising practices related to the needs of adult learners across providers. In programs where students readily make gains in reading, the state will support staff in the development of teacher lessons, resource links, and fund preparation for training to assist colleagues in successful reading instruction.

Montana's partners continue to collaborate and leverage resources to promote dialog between employers, workers, training providers, and agencies to develop career pathways within industry, close skill gaps, address needs of special populations, and align curricula and training to meet the demands of the workforce.

## G. Leveraging Resources to Increase Educational Access

Describe how the State's strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

There are multiple funding sources available in Montana to fund training and education programs. The state of Montana will continue working across partners to braid funding to support the following:

- Coordinated industry and employer engagement to identify training and workforce needs and develop registered apprenticeship or education pathways to meet their needs;
- Development of systems to align data and develop common intake to benefit all service providers and streamline referrals, ensure greater accountability, and increase collaboration across partners; and
- Support statewide training on partner programs and foster a greater understanding of the following:
  - Career pathways;
  - Registered apprenticeship;
  - Use of LMI; and
  - Identifying and sharing best practices across partners.

In addition to aligning resources at the state level, there are regional and community-based workforce initiatives happening across the state with community-based partners leveraging local and philanthropic resources to coordinate education, industry, economic development, and workforce systems to meet local needs.

All state, federal, local, and philanthropic resources leveraged throughout the state help further develop a fully accessible, aligned workforce and talent development system designed to meet Montana's workforce challenges and better serve all clients, both individuals and businesses, receiving services across programs.

## H. Improving Access to Postsecondary Credentials

Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

Statewide alignment across partners, agencies, secondary and post-secondary systems will ensure that more Montanans have access to, and the ability to attain a postsecondary credential. In addition, the state of Montana will develop a plan to identify and track credential attainment across the state. The state will leverage the following strategies to increase access to postsecondary credentials:

- Dual Enrollment:
  - The state of Montana will continue to expand access to and participate in dual enrollment courses, across a variety of course types and in high schools of all sizes.
- Career and Technical Education (CTE) and Work-Based Learning:
  - The state of Montana will work across agencies and partners to develop a process to evaluate which industry-recognized credentials are credentials of value to employers in Montana; and
  - Ensure that CTE educators are able to access and understand LMI and how it applies to the development of CTE programs of study;
- Return to School and Reverse Transfer:
  - Collaborate between OCHE and DLI to engage individuals who started, but did not complete, a degree program through the higher education system and help those individuals obtain a degree or credential.
- Registered Apprenticeship:
  - Continue engaging employers and partners to support and expand registered apprenticeship opportunities across the state.
- Retention and Degree Completion:
  - Work across partners to support the implementation of strategies to increase retention and graduation rates across Montana's university system; and
  - Support the establishment of national best practices for data collection, analysis, dissemination, and use data-informed decision making to continue enhancing programs across higher education.
- Military Service:
  - Continue supporting and promoting military service as a valuable career track for students to attain postsecondary education, training, certification, and career opportunities; and
  - Continue working across partners to support the transition of veterans to postsecondary degree or credential attainment, including through prior learning assessments.

## I. Coordinating with Economic Development Strategies

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.

At the state level, workforce partners are engaged in the state's larger economic development vision. As the Governor's Office of Economic Development and Montana's Department of Commerce work with Montana businesses, they hear that the lack of trained workforce remains a significant challenge for sustained economic growth in communities across the state. The lack of workers has afforded workforce partners, agencies, and economic development partners the opportunity to work together to meet the workforce challenges.

In many of Montana's communities, both large and small, there is successful collaboration happening through coalitions of groups working together to meet economic and workforce challenges specific to those communities. Groups include, but aren't limited to:

- Local economic development entities;
- Local Chambers of Commerce;
- Industry leaders;
- Education partners;
- City, county, and state elected officials;
- Community foundations;
- Adult education;
- Local job service offices;
- Vocational Rehabilitation and Blind Services;
- Two-year and community colleges; and
- Other community-based service providers.

These groups look at the community as a whole to identify community needs including sustained economic growth, issues impacting workforce recruitment, retention, and training, industry needs, infrastructure needs, housing and healthcare accessibility, education and industry partnerships, and other community needs.

State agencies work to support locally developed solutions to the sustained economic growth and workforce development issues within communities. The state supports this work through the development of training and education to meet industry needs, assistance developing and sustaining sector partnerships, and staff support.

## b. State Operating Systems and Policies

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section II **Strategic Elements**. This includes—

The state of Montana answered III. b. 1. A. and B. holistically, the response to each section within the portal is the same:

The Research and Analysis Bureau of DLI provides online access to labor market information and data at <http://lmi.mt.gov>. The website pulls data from the Workforce Information Database developed by the Analyst Resource Center, under a grant from the U.S. Department of Labor Employment and Training Administration. The data provided is produced by the Bureau's cooperative programs with the Bureau of Labor Statistics (BLS) as well as other data sources, such as the U.S. Census Bureau, BEA, and administrative programs. The Montana Career Information System (MCIS) is the state's chosen system for providing comprehensive career information under WIOA. MCIS provides career assessments, state and national occupational, education and training information. All occupational information comes from the Research and Analysis Bureau's Occupational Employment Statistics and the U.S. Department of Labor's O\*Net database. Each job seeker will create an e-portfolio in MCIS in order to save assessment results, occupational and education research, create resumes, and other career planning activities. MCIS enables the core partners to access the portfolio contents for shared clients, resulting in a seamless delivery of career services across programs.



WIOA programs under Titles I and III collect client intake and program activity data, including any information required for reporting, using the MWorks system. WIOA programs under Title II collect client data using the MACS system and data under Title IV is collected using the CASES system.

Each program's client data is tracked individually in each system during the client's participation period. Any performance reporting unique to a specific program are handled within the program's relevant system.

DLI developed a system for creating statewide reports. The reporting system is a three-layered data system consisting of a staging, integrating, and reporting layer. The final output of the system is the PIRL, and other reporting documents.

- - On a quarterly basis each program submits the necessary client data from each programs' respective data system to DLI. Demographic indicators, client specific program activity, and performance are among the data transmitted.
  - The data submitted by programs first enters the staging layer where data is validated for formatting requirements.
  - Once validated, data moves to the integration layer where records from clients in multiple programs are reconciled and external data sources used in reporting, such as UI wage records, are brought in.
  - Once reconciled, the data in the integration layer moves to the reporting layer where performance values are calculated and stored. The reporting layer is the basis upon which reporting documents, such as the PIRL, are created.

The reporting system connects to UI wage records, SWIS and other systems which are matched to clients using social security numbers as a common identifier.

## 1. The State operating systems that will support the implementation of the State's strategies. This must include a description of—

### A. State operating systems that support coordinated implementation of State strategies (e.g., labor market information systems, data systems, communication systems, case-management systems, job banks, etc.)

The state of Montana answered III. b. 1. A. and B. holistically, the response to each section within the portal is the same:

The Research and Analysis Bureau of DLI provides online access to labor market information and data at <http://lmi.mt.gov>. The website pulls data from the Workforce Information Database developed by the Analyst Resource Center, under a grant from the U.S. Department of Labor Employment and Training Administration. The data provided is produced by the Bureau's cooperative programs with the Bureau of Labor Statistics (BLS) as well as other data sources, such as the U.S. Census Bureau, BEA, and administrative programs. The Montana Career Information System (MCIS) is the state's chosen system for providing comprehensive career information under WIOA. MCIS provides career assessments, state and national occupational, education and training information. All occupational information comes from the Research and Analysis Bureau's Occupational Employment Statistics and the U.S. Department of Labor's O\*Net database. Each job seeker will create an e-portfolio in MCIS in order to save assessment results, occupational and education research, create resumes, and other

career planning activities. MCIS enables the core partners to access the portfolio contents for shared clients, resulting in a seamless delivery of career services across programs.

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DLI developed a system for creating statewide reports. The reporting system is a three-layered data system consisting of a staging, integrating, and reporting layer. The final output of the system is the PIRL, and other reporting documents.

- On a quarterly basis each program submits the necessary client data from each programs' respective data system to DLI. Demographic indicators, client specific program activity, and performance are among the data transmitted.
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- Once validated, data moves to the integration layer where records from clients in multiple programs are reconciled and external data sources used in reporting, such as UI wage records, are brought in.
- Once reconciled, the data in the integration layer moves to the reporting layer where performance values are calculated and stored. The reporting layer is the basis upon which reporting documents, such as the PIRL, are created.

The reporting system connects to UI wage records, SWIS and other systems which are matched to clients using social security numbers as a common identifier.

## B. Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers

Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.<sup>10</sup>

[10] For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

The state of Montana answered III. b. 1. A. and B. holistically, the response to each section within the portal is the same:

The Research and Analysis Bureau of DLI provides online access to labor market information and data at <http://lmi.mt.gov>. The website pulls data from the Workforce Information Database developed by the Analyst Resource Center, under a grant from the U.S. Department of Labor Employment and Training Administration. The data provided is produced by the Bureau's cooperative programs with the Bureau of Labor Statistics (BLS) as well as other data sources, such as the U.S. Census Bureau, BEA, and administrative programs. The Montana Career Information System (MCIS) is the state's chosen system for providing comprehensive career information under WIOA. MCIS provides career assessments, state and national occupational, education and training information. All occupational information comes from the Research and Analysis Bureau's Occupational Employment Statistics and the U.S. Department of Labor's O\*Net database. Each job seeker will create an e-portfolio in MCIS in order to save assessment results, occupational and education research, create resumes, and other

career planning activities. MCIS enables the core partners to access the portfolio contents for shared clients, resulting in a seamless delivery of career services across programs.

WIOA programs under Titles I and III collect client intake and program activity data, including any information required for reporting, using the MWorks system. WIOA programs under Title II collect client data using the MACS system and data under Title IV is collected using the CASES system.

Each program's client data is tracked individually in each system during the client's participation period. Any performance reporting unique to a specific program are handled within the program's relevant system.

DLI developed a system for creating statewide reports. The reporting system is a three-layered data system consisting of a staging, integrating, and reporting layer. The final output of the system is the PIRL, and other reporting documents.

- On a quarterly basis each program submits the necessary client data from each programs' respective data system to DLI. Demographic indicators, client specific program activity, and performance are among the data transmitted.
- The data submitted by programs first enters the staging layer where data is validated for formatting requirements.
- Once validated, data moves to the integration layer where records from clients in multiple programs are reconciled and external data sources used in reporting, such as UI wage records, are brought in.
- Once reconciled, the data in the integration layer moves to the reporting layer where performance values are calculated and stored. The reporting layer is the basis upon which reporting documents, such as the PIRL, are created.

The reporting system connects to UI wage records, SWIS and other systems which are matched to clients using social security numbers as a common identifier.

## 2. The State policies that will support the implementation of the State's strategies (e.g., co-enrollment policies and universal intake processes where appropriate). In addition, provide the State's guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system

DLI publishes and maintains all WIOA policies and guidance regarding the operation and service delivery of WIOA programs in keeping with state and federal laws and regulations here: <http://wsd.dli.mt.gov/wsd-policy#WIOA-2385>

DPHHS maintains guidance on WIOA as it pertains to VRBS programs here: <http://dphhs.mt.gov/detd/vocrehab>.

OPI maintains guidance on WIOA as it pertains to AE programs here: <http://opi.mt.gov/Families-Students/Student-Resources/Veterans-Adult-Education>

For ongoing, updated, or new guidance, WIOA core partner agencies and the SWIB draft, publish and coordinate policy guidance, service delivery strategies, program and related measurements, and funding.

The state's one-stop partners, in conjunction with SWIB, developed guidance for the one-stop partner program's contributions to the one-stop delivery system based on guidance received from US DOL.

Guidelines are found in the state's One-Stop System Policy and the Infrastructure Funding Agreement is reviewed annually with each partner as part of the process for renewing the required Memorandum of Understanding (MOU).

### 3. State Program and State Board Overview

#### A. State Agency Organization

Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

Workforce Services Division within DLI is responsible for administering WIOA Title I and Wagner-Peyser programs, as well as the following programs:

- Trade Adjustment Assistance;
- Work Opportunity Tax Credit;
- State Registered Apprenticeship;
- State Displaced Homemaker;
- Migrant and Seasonal Farmworkers;
- Senior Community Services Employment Program;
- Foreign Labor Certification;
- Federal Bonding National Emergency Grants;
- Montana's Incumbent Worker Program;
- Jobs for Montana's Graduates;
- Reemployment Services and Eligibility Assessment (RESEA);
- Medicaid Expansion Workforce Program (HelpLink);
- Labor Market Information;
- Jobs for Veterans State Grant Program; and
- The Job Service Operations Bureau.

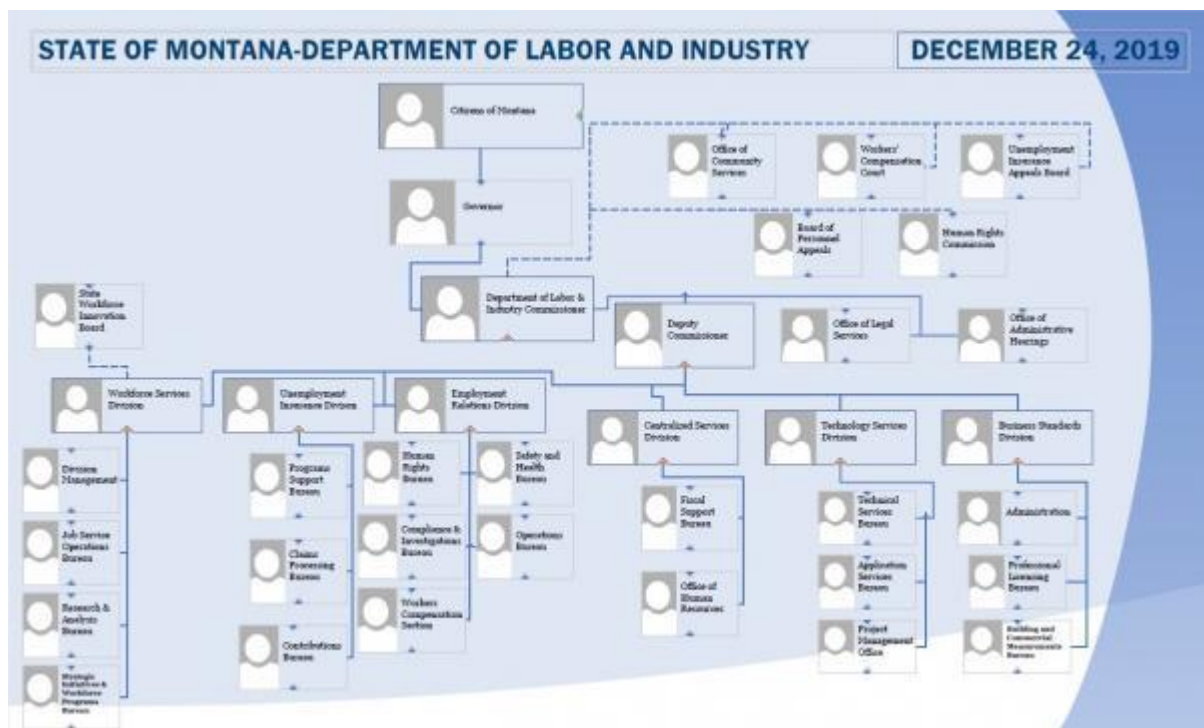
Montana's Unemployment Insurance program is housed within DLI and coordinates clients with Montana's public workforce partners to help individuals transition into employment or training.

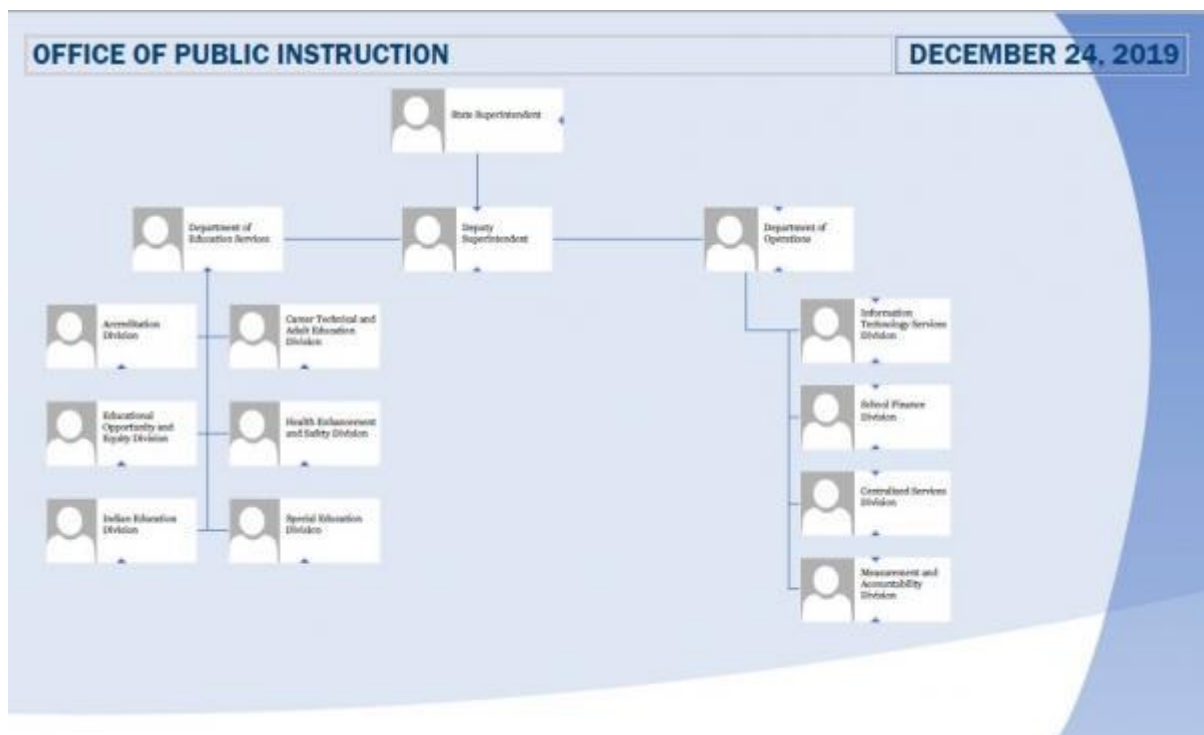
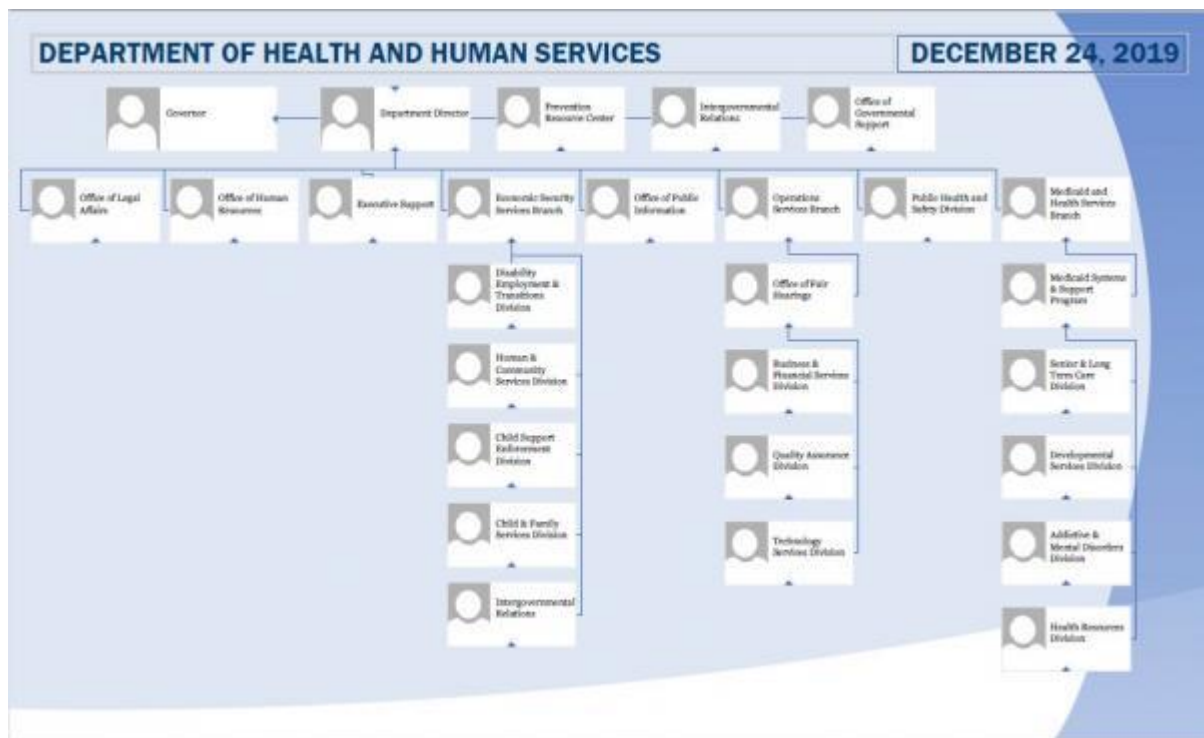
In addition, DLI coordinates and guides the delivery of workforce development services in local communities, in coordination with the SWIB. There is also active coordination of Registered Apprenticeship with Job Service offices, and there are plans to coordinate Job Corps services with Registered Apprenticeship and the other services offered at Job Service offices.

VRBS programs are housed within the Montana Department of Public Health and Human Services (DPHHS). The VRBS administrator is the designee for the Director of DPHHS on the SWIB and is able to provide programmatic updates to the board. DPHHS is also a signatory partner of the state's One-Stop Delivery System's Memorandum of Understanding and Consortium Agreement, whereby the parties agree to support all the state's one-stop system. As a workforce partner, and in an effort to better coordinate services and cross train on programs, VRBS provides training to workforce partners on their services and contributes their expertise to ensure all customers are served effectively within the system. As stated above, WIOA Title IV programs use the CASES system to implement and track programs and services.

AE programs fall under the direction of the Montana Office of Public Instruction, and the program manager for AE is the Superintendent of Public Instruction's designee to the SWIB. The Office of Public Instruction is also a signed partner of the state One-Stop Delivery System's Memorandum of Understanding and Consortium Agreement, whereby the parties agree to support Montana's one-stop system. Additionally, AE coordinates the Interagency Career Pathways group, and members of this group include, but are not limited to, representatives from various workforce partners such as AE, DPHHS, DLI, SWIB staff, the Governor's Office, and the Montana University System. WIOA Title II programs use the MACS system to implement and track programs and services.

The state workforce system as a whole is overseen by the SWIB. The SWIB's mission is to advise the Governor on statewide workforce development strategies that maximize the state's education, training and employment resources in support of economic development. The board leads the state in broad strategic workforce initiatives that leverage resources beyond WIOA funding, while providing necessary system oversight.





## B. State Board

Provide a description of the State Board, including—

This section is duplicative and addressed in a different section of the state plan.

### i. Membership Roster

Provide a membership roster for the State Board, including members' organizational affiliations.

***Public***

Governor Steve Bullock  
Ken Fichtler (Designee)  
Director, Governor's Office of Economic Development

Superintendent Elsie Arntzen  
Office of Public Instruction  
Katie Madsen (Designee)  
Adult Education Unit Manager

Sheila Hogan  
Director, Department of Public Health and Human Services  
Chanda Hermanson-Dudley (Designee)  
Administrator, Disability Employment & Transitions and Vocational Rehabilitation programs

Commissioner Brenda Nordlund  
Department of Labor & Industry  
Scott Eychner (Designee)  
Administrator, Workforce Services Division

Commissioner Michael McGinley  
Beaverhead County Commissioner

Commissioner Jane Weber  
Cascade County Commissioner

***Ex-Officio; Public***

Commissioner Clayton Christian  
Office of the Commissioner of Higher Education  
Brock Tessman (Designee)  
Deputy Commissioner of Higher Education

Tara Rice  
Director, Department of Commerce

***Community Organization***

Karen Baumgart  
Director of BillingsWorks  
Big Sky Economic Development

***Workforce***

Vicky Byrd  
Executive Director, Montana Nurses Association

Al Ekblad  
Executive Secretary, Montana AFL-CIO

Kristin Tessman  
Executive Director, American Jobs for American Youth

***Business***

Dean Bentley (Vice Chair)  
Labor Relations Analyst  
NorthWestern Energy

Becky Bey  
Government Relations Specialist  
KLJ Engineering

Jeaneen Campbell  
Regional Sales Executive  
Blue Cross-Blue Shield of Montana

Ross Lane  
Vice President of Corporate Relations  
Montana Rail Link

Rebecca Morgan  
Owner, Operator  
Spark it up Creative

Heather O'Hara  
Vice President  
Montana Hospital Association

Loren Rose (Chair)  
Chief Financial Officer  
Pyramid Lumber

Asta So  
Head of People  
Submittable

Grover Wallace  
Operations/Human Resource Manager  
Sibanye-Stillwater Mining Company

Jennifer Kobza  
Owner  
TKI LLC

**\*\*Note:** the SWIB continues to coordinate with the Governor's Office to recruit business members to the board.

## ii. Board Activities

Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.

The standing committees of the State Workforce Innovation Board include the Executive Committee, the WIOA committee, and the Strategic Workforce Initiatives Committee. In addition, the board oversees the Apprenticeship Advisory Council, which provides guidance to the state's Registered Apprenticeship program. The SWIB also convenes ad hoc committees to work on topic-specific issue recommendations from the Governor and established priorities of the SWIB. All SWIB committees conduct business as an advisory body to the Governor on statewide workforce system issues, as well as to assume responsibility for performing all WIOA local workforce board duties.

- - Executive Committee: The Executive Committee is comprised of board officers and no more than ten at-large representatives. The majority of its members are business members. The at-large representatives of the Executive Committee shall be members of the SWIB and are appointed by the chair. The Executive Committee leads the SWIB workgroups and has the authority to act on behalf of the SWIB. The Executive Committee's responsibilities are to:
    - track workgroup plans and progress;
    - offer leadership around alignment of workgroups;



- offer leadership around leveraging system partners; and
  - drive the provision of critical workforce data.
- WIOA Committee: The WIOA Committee is charged with ensuring compliance with the applicable WIOA laws and regulations governing the Title 1B Adult, Youth and Dislocated Worker programs, and to bring policy issues and recommendations to the Governor and SWIB.
  - Strategic Workforce Initiatives Committee: The Strategic Workforce Initiatives Committee works on workforce-specific timely projects and shares promising practices from across the state.
  - Ad Hoc Committees: Ad Hoc Committees are appointed by the SWIB Chair to work on topic-specific issue recommendations from the Governor or serve in a limited capacity to achieve SWIB-specific special projects.

## 4. Assessment and Evaluation of Programs and One-Stop Program Partners

### A. Assessment of Core Programs

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

Service providers that administer Title I and III programs are monitored annually for program compliance as well as fiscal compliance. At the conclusion of each monitoring visit, a report is written by the monitoring unit and shared with the program managers. Program managers work directly with the local service providers to resolve monitoring findings and provide technical assistance.

On a monthly basis, program managers hold technical assistance calls with all Title I service providers to go over a variety of topics including performance accountability measures. Based on the previous quarter's reporting results, assistance is given for how to correctly report information into the management information system, as well as how to provide service to individuals that will result in higher accountability measures. Montana is working on expanding this technical assistance to include individual provider performance reporting results to better pinpoint where gaps in service are occurring.

The Montana SWIB implemented additional performance accountability measures for all service providers operating Title 1 programs, including cost per participant goals, exited to employment goals and rapid response service goals. This allows the department to look at other outcomes and performance for quality and effectiveness of service as well as ways to improve service delivery. This also helps direct technical assistance topics as well as look at local and regional planning goals.

In addition, calls are conducted on a quarterly basis with Title I and Title III programs to discuss PIRL reporting. Montana continues to work to improve this process for communication to provide meaningful feedback to improve the quality of our programs.

Title II programs are assessed based on data received from program outcomes and technical assistance is provided by program staff as needed. Title IV requires assessment every three years to look at the needs of citizens in the state as well as the services provided by the program.

### B. Assessment of One-Stop Partner Programs

Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

Programs included in the assessment of one-stop programs include TAA and SCSEP. The TAA program is included in the program and fiscal monitoring cycle. Each provider who has TAA clients in their local area are monitored quarterly and technical assistance is provided as needed.

Since the TAA program is reported on the PIRL, the state has access to quarterly reports for the program which were not available through the old reporting system. This has allowed Montana the ability to better assess the program.

SCSEP data for the state SCSEP grant is reviewed quarterly by the program manager. Performance measures are set by USDOL and the program manager ensures these measures are met and provides technical assistance as necessary. Data validation is conducted for the SCSEP program annually and the results of that are analyzed.

## C. Previous Assessment Results

Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.

DLI continues to focus its efforts on improving its reporting in the PIRL. The state is working to ensure that all participants are included in the data to better assess the performance of Title I and Title III programs under WIOA. In addition, partners are working across programs to use performance data to collaborate on service improvement.

The state of Montana will continue using data and program assessment as one indicator of the program success. In addition, the state continues to seek innovative data-driven approaches to improve the quality of programs across partners to better serve Montanans.

In addition to data collected and reviewed as part of WIOA compliance, the state of Montana uses additional data sources to develop best practices and learn more about populations using the system and barriers they face. The state is hopeful that studying populations across the state will help ensure that all individuals receive services to help them successfully transition into training, education, or meaningful employment.

Data is also used to develop targeted outreach to additional community partners and groups that serve individuals with barriers to employment.

## D. Evaluation

Describe how the State will conduct evaluations and research projects on activities under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

As a part of providing services, client data including Social Security numbers are collected within the secure production database. Economists in the Research & Analysis Bureau of the Montana Department of Labor & Industry then extract the needed data out of the database for the evaluation period, including the necessary variables for evaluation (such as personal identifiers, services provided, location service provided, type of funding used, or other factors). Using the personal identifying information (most often the Social Security number), client data is then matched with wage

records from the Unemployment Insurance Program. These wage records provide employment histories for the clients so that the evaluation can determine whether the intervention of a service changed the trajectory of wage growth or led to more consistent employment patterns than what the client previously experienced. Funding dollars are matched in from a third accounting dataset that tracks payments from the Department to various recipients. If needed, the analysis also utilized unemployment insurance claims data to determine whether the client made unemployment insurance claims prior to or after the service intervention.

Economists also occasionally do more sophisticated analysis, including regression or matching pair analysis, to research the impact of the service on the wages and employment patterns of clients. In addition, outcomes are compiled by location, type of provider, funding source, or type of service to evaluate the efficacy of how services are provided.

The Department of Labor & Industry also has active MOUs with the Departments of Corrections, the Office of the Commissioner of Higher Education, the Office of Public Instruction, and private education providers to share data needed for workforce training evaluation. These partners will continue to be important in providing information on training outcomes that may be needed for the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

The Research & Analysis bureau has conducted such research in the past but is now expanding their capabilities to conduct evaluative research in response to the directives in WIOA and in response to a greater need for information in planning from agency leadership. Additional staff have been hired, and greater direct access to the data has been provided to facilitate more evaluative work with increased depth and scope. Thus far, evaluative work has been completed to provide a baseline to agency management and state leadership. As these findings are presented to the SWIB and the Montana Legislature, additional research questions will be raised by political and business leaders.

The Research and Analysis Bureau strives to provide as much high-quality information as requested by these governing bodies given the funding provided by state and local authorities.

## 5. Distribution of Funds for Core Programs

Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

### A. For Title I Programs

Provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

#### i. Youth Activities in Accordance with WIOA Section 128(b)(2) or (b)(3)

The state of Montana answered III. b. 5. A. i. ii. and iii. with one response, all the following sections will reflect the same language.

Funding distribution for all Title I programs is outlined in the WIOA Funding Allocation Policy established by the SWIB is located online here:

<http://wsd.dli.mt.gov/Portals/56/Documents/WSDPolicy/WIOA%20Funding%20Allocation%20Policy.pdf?ver=2019-04-16-144835-760>.

Montana has two local areas. Local area 1 consists of Montana Association of Counties (MACo) districts 8, 12, and Meagher County, which is part of MACo district 9. Local area 2 consists of the remainder of the state of Montana. WIOA funding for the adult and youth programs is allocated to each area based on the following formula:

- 1/3 – relative share of unemployed in areas of substantial unemployment (ASU – a contiguous area with an average unemployment rate of 6.5% or greater);
- 1/3 – relative share of excess unemployed greater than 4.5%;

- 1/3 – relative to share of the total number of individuals who are economically disadvantaged.

A local area may not receive an allocation percentage that is less than 90% of the average allocation percentage of the past two years. Once the allocation is determined by local area, funding is distributed to each MACo district by calculating the average percentage of funds received by that MACo district compared to the respective local area in the past two years. The WIOA Adult and Youth funds are contracted by the SWIB to service providers selected through RFP processes.

WIOA Dislocated Worker funds are contracted by the SWIB to one service provider selected through a formal request for proposal (RFP) process. Dislocated Worker funding is based on a formula set by the SWIB that includes insured unemployment data, unemployment concentrations, plant closings and mass layoff data, declining industries data, farmer-rancher economic hardship data, and long-term unemployment data. The SWIB applied weights and measurements to each category to determine the amount of funding allocated to Local Area 1 and Local Area 2 in Montana.

## ii. Adult and Training Activities in Accordance with WIOA Section 133(b)(2) or (b)(3)

The state of Montana answered III. b. 5. A. i. ii. and iii. with one response, all the following sections will reflect the same language.

Funding distribution for all Title I programs is outlined in the WIOA Funding Allocation Policy established by the SWIB is located online here:

<http://wsd.dli.mt.gov/Portals/56/Documents/WSDPolicy/WIOA%20Funding%20Allocation%20Policy.pdf?ver=2019-04-16-144835-760>.

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- 1/3 – relative share of unemployed in areas of substantial unemployment (ASU – a contiguous area with an average unemployment rate of 6.5% or greater);
- 1/3 – relative share of excess unemployed greater than 4.5%;
- 1/3 – relative to share of the total number of individuals who are economically disadvantaged.

A local area may not receive an allocation percentage that is less than 90% of the average allocation percentage of the past two years. Once the allocation is determined by local area, funding is distributed to each MACo district by calculating the average percentage of funds received by that MACo district compared to the respective local area in the past two years. The WIOA Adult and Youth funds are contracted by the SWIB to service providers selected through RFP processes.

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## iii. Dislocated Worker Employment and Training Activities in Accordance with WIOA Section 133(b)(2) and Based on Data and Weights Assigned

The state of Montana answered III. b. 5. A. i. ii. and iii. with one response, all the following sections will reflect the same language.

Funding distribution for all Title I programs is outlined in the WIOA Funding Allocation Policy established by the SWIB is located online here:

<http://wsd.dli.mt.gov/Portals/56/Documents/WSDPolicy/WIOA%20Funding%20Allocation%20Policy.pdf?ver=2019-04-16-144835-760>.

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- 1/3 – relative share of unemployed in areas of substantial unemployment (ASU – a contiguous area with an average unemployment rate of 6.5% or greater);
- 1/3 – relative share of excess unemployed greater than 4.5%;
- 1/3 – relative to share of the total number of individuals who are economically disadvantaged.

A local area may not receive an allocation percentage that is less than 90% of the average allocation percentage of the past two years. Once the allocation is determined by local area, funding is distributed to each MACo district by calculating the average percentage of funds received by that MACo district compared to the respective local area in the past two years. The WIOA Adult and Youth funds are contracted by the SWIB to service providers selected through RFP processes.

WIOA Dislocated Worker funds are contracted by the SWIB to one service provider selected through a formal request for proposal (RFP) process. Dislocated Worker funding is based on a formula set by the SWIB that includes insured unemployment data, unemployment concentrations, plant closings and mass layoff data, declining industries data, farmer-rancher economic hardship data, and long-term unemployment data. The SWIB applied weights and measurements to each category to determine the amount of funding allocated to Local Area 1 and Local Area 2 in Montana.

## B. For Title II

i. Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness

The state of Montana answered sections III. b. 5. B. i. and ii. as a combined response.

The state will award multi-year grants on a competitive basis to eligible providers to develop, implement, and improve adult education and literacy activities. Grants will be awarded to each of the state's multi-county workforce districts to align with core partner availability and services. Many platforms will be used to ensure direct and equitable access for the competition. These platforms may include local newspapers, newsletters, press release, social media, and contacts with other state and local agencies. Eligible providers contacted may include, but are not limited to those listed in Section 203(5): a local education agency, a community or faith-based organization, a volunteer literacy organization, an institution of higher education, a public or private non-profit, a library, a public housing authority, other non-profits that have the ability to provide adult education, a consortium or coalition of entities listed, a partnership between an employer and an entity listed.

In compliance with all state and federal procurement regulations and procedures, the competitive RFP process will begin with a legal notice posted. This will be followed by the grant release, a bidder's conference to provide technical assistance, application review, list of accepted applicants released with follow-up budget and program negotiations with each accepted applicant.

The district competition will adhere to the provisions set forth in WIOA Title II Section 231-Grants and Contracts for Eligible Providers and Section 232-Local Applications. All district competitions use the same RFP grant application process. Grantees that receive funds under the initial RFP competition are required to submit annual plans until the state determines it is necessary to issue a new RFP competition for the state or a specific region.

There are two ways in which an eligible provider may demonstrate past effectiveness. An eligible provider that has been funded previously under Title II of the Act must provide performance data required under Section 116-Performance Accountability System. An eligible provider that has not been previously funded under Title II of the Act must provide performance data to demonstrate past effectiveness in serving basic skills deficient eligible individuals, including evidence of its success in achieving outcomes related to employment, attainment of secondary equivalency diploma, and transition to postsecondary education and training.

**ii. Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers**

The state of Montana answered sections III. b. 5. B. i. and ii. as a combined response.

The state will award multi-year grants on a competitive basis to eligible providers to develop, implement, and improve adult education and literacy activities. Grants will be awarded to each of the state's multi-county workforce districts to align with core partner availability and services. Many platforms will be used to ensure direct and equitable access for the competition. These platforms may include local newspapers, newsletters, press release, social media, and contacts with other state and local agencies. Eligible providers contacted may include, but are not limited to those listed in Section 203(5): a local education agency, a community or faith-based organization, a volunteer literacy organization, an institution of higher education, a public or private non-profit, a library, a public housing authority, other non-profits that have the ability to provide adult education, a consortium or coalition of entities listed, a partnership between an employer and an entity listed.

The competitive process will begin with a legal notice posted. This will be followed by the grant release, a bidder's conference to provide technical assistance, application review, list of accepted applicants released with follow-up budget and program negotiations with each accepted applicant.

The district competition will adhere to the provisions set forth in WIOA Title II Section 231-Grants and Contracts for Eligible Providers and Section 232-Local Applications. All district competitions will use the same grant application process. Grantees receiving funds under the initial competition will be required to submit annual extension plans each year until such time the state determines it is necessary to issue a new competition for the state or a specific region.

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## **C. Vocational Rehabilitation Program**

In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

Montana Vocational Rehabilitation and Blind Services (VRBS) distributes funding through contracts and its client benefits system. Since VRBS is a combined general and blind services agency, the funds are not distributed separately.

## 6. Program Data

### A. Data Alignment and Integration

Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.

#### i. Describe the State's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation

The state of Montana wrote III. b. 6. A. i. and ii. together.

DLI's workforce and UI clients have the ability to create accounts through MontanaWorks with a single sign on. This portal is the first step in beginning to align data and programs to allow DLI to better serve clients and share client data across divisions and programs. DLI is also finalizing its data warehouse, which is designed to capture client data across programs and improve reporting, data analysis, and better assess program performance.

In addition to the data warehouse and MontanaWorks, Montana's DLI is developing a new case management system. Once complete, the system will allow for better program administration, data collection, and with future enhancements, will improve data alignment across core and partner programs. The case management system includes functionality that will allow additional WIOA partner programs to interface with DLI's system. The new case management system will provide the opportunity for integrated case management across partner programs, and its improved data reporting capabilities will help economists and data analysts identify common data, improve reporting accuracy, and streamline program delivery to program clients.

The system is part of the state's strategy and vision to deliver quality and timely services to clients, both businesses and individuals, in a consistent, coordinated way. This will ensure the public workforce system is responsive to workforce demands throughout the state.

#### ii. Describe the State's plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan

The state of Montana wrote III. b. 6. A. i. and ii. together.

DLI's workforce and UI clients have the ability to create accounts through MontanaWorks with a single sign on. This portal is the first step in beginning to align data and programs to allow DLI to better serve clients and share client data across divisions and programs. DLI is also finalizing its data warehouse, which is designed to capture client data across programs and improve reporting, data analysis, and better assess program performance.

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reporting capabilities will help economists and data analysts identify common data, improve reporting accuracy, and streamline program delivery to program clients.

The system is part of the state's strategy and vision to deliver quality and timely services to clients, both businesses and individuals, in a consistent, coordinated way. This will ensure the public workforce system is responsive to workforce demands throughout the state.

**iii. Explain how the State board will assist the governor in aligning technology and data systems across required one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals**

The SWIB assists the Governor in aligning technology and data systems across core programs through ongoing review of program implementation and prioritizing system coordination. The board will receive regular updates on the status of alignment efforts and will make alignment recommendations to the core partners, as appropriate.

The SWIB encourages alignment of technology and data systems to support the development of a true one-stop service delivery, through identification of common customers and providing suitable referrals based on data. Additionally, alignment of technology and customer data will allow programs to leverage resources, eliminate duplication and provide new opportunities for innovative cross-program solutions.

**iv. Describe the State's plans to develop and produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2))**

Montana's WIOA core partners are in three different state agencies: Montana Department of Labor & Industry operates Titles I and III of WIOA, Montana Department of Public Health and Human Services operates Title IV of WIOA, and Montana Office of Public Instruction operates Title II of WIOA.

Montana Department of Labor & Industry has enhanced the reporting system, MWorks, to function with WIOA requirements and continues to improve the system. Currently, MWorks can produce the full PIRL quarterly and annual reports in compliance with WIOA Section 116. The fiscal reporting process can accurately report all financial reports that are required under WIOA including cost per client, amount of funds spent on each type of service, career and training services, and administrative expenses.

## **B. Assessment of Participants' Post-program Success**

Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

The state of Montana captures information to assess the progress of participants exiting core programs to enter and complete post-secondary education or enter and remain in employment. This is accomplished through the Department of Labor & Industry's Research and Analysis Bureau (R&A). R&A has access to several databases that help provide information on progress of participants for these key milestones. Montana continues to work toward consolidation of data in a data warehouse or combined reporting system.



The three core partners assess post-program success differently. Title 1 Adult and Dislocated Worker participants who exit to employment receive follow-up services quarterly. These participants are contacted at least once a quarter to see if they need assistance in job retention, wage gains, and career progress. Follow-up services for WIOA Adult and Dislocated Workers could include additional career planning and counseling, contact with the participant's employer, including assistance with work related problems, peer support groups, information about additional educational opportunities, limited financial support, and referral to support services available in the community. Appropriate follow-up services vary among participants, for example participants with multiple employment barriers and limited work histories may need significant follow-up services to ensure long-term success in the labor market.

Title 1 Youth participants must receive an offer of follow-up services for a minimum duration of 12 months. Follow-up services are critical services provided following a youth's exit from the program to ensure the youth is successful in employment and/or post-secondary education and training. Youth follow-up services may include leadership development and supportive service activities, regular contact with youth participant's employer, including assistance in addressing work-related problems that arise, assistance in securing better paying jobs, career pathway development and further education or training, work-related peer support groups, adult mentoring, and providing services as necessary to ensure the success of youth participants in employment and/or post-secondary education.

Adult Education and Vocational Rehabilitation programs follow clients after exit through performance outcomes.

## C. Use of Unemployment Insurance (UI) Wage Record Data

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

The state will use UI wage records from several sources in order to meet reporting requirements. Individual UI wage records from Montana are provided to the reporting system through a background database connection with Montana UI's Montana Integrated System to Improve Customer Service (MISTICS) system. Queries are also made to SWIS to supplement state UI wage records with out-of-state and federal employment data. The reporting system compiles and matches wage records to individuals on a quarterly basis to meet the performance requirements of WIOA.

State UI wage records, along SWIS records when appropriate, are a fundamental piece of Montana's program evaluation goals. Montana's DLI Research and Analysis (R&A) Bureau receives a quarterly file of Unemployment Insurance (UI) wage records for payroll workers in the state of Montana. These wage records are stored on secure servers meeting the federal confidentiality standards while R&A staff are experienced in matching state UI wage record files to person records and producing summary information from those records such that confidentiality is maintained. R&A staff will use the statistical software SAS or R to match WIOA clients with their wage records using SSNs as the primary key to link records.

Following this match, the statistical software is used to manipulate and analyze the data to support system-wide analyses of customer outcomes that result on specific program experiences. These analyses will provide information to guide staff as they assist customers in selecting jobs and training opportunities that are likely to result in quality career paths. R&A staff have produced many evaluative publications on workforce programs and the labor market in the past.

A report on the labor market outcomes of clients in the Montana Registered Apprenticeship Program demonstrates the employment and wage benefits of apprenticeship programs in general, as well as apprenticeships for specific high performing occupations.

A report shows the labor market outcomes of students graduating from the Montana University System and other voluntarily participating educational institutions. The report analyzes employment and income outcomes for college graduates by degree type and field of study.

A report identifies the employment outcomes of clients in the HELP-Link program, a workforce program component to Montana's Medicaid expansion law. The report evaluates pre- and post-participation wage data for program clients, as well as occupational outcomes to provide information on the program's efficacy and reach.

A report on WIOA Adult and Dislocated Worker Program clients based on the provider of services analyzes employment and wage outcomes of clients and provides information for program administrators to target areas for improvement.

The Department is currently engaged in a project in partnership with the Abdul Latif Jameel Poverty Action Lab at the Massachusetts Institute of Technology to evaluate the effectiveness of RESEA in enhancing the employability and wage outcomes of clients, as well as evaluations of distance delivery methods. The partnership with JPAL will enhance current staff knowledge and capabilities in conducting randomized evaluations and preparing results for publication in peer-reviewed journals so results can be utilized by other states and localities.

As time, funding, and resources permit, R&A staff will continue with further evaluations. Evaluations using state UI wage records can inform internal policies, assist program clients with decision making, and provide information for targeted improvement projects.

Montana is also working to expand data sources available for wage matching. In the past several years, the Department has established MOUs for the sharing of data with two private colleges in Montana, several tribal colleges (for limited data), the Office of the Commissioner of Higher Education, and the Montana Department of Revenue. The colleges share PII with the Research and Analysis Bureau, who in turn matches this information with wages and locations when the student becomes employed. The information is then summarized and can be given back to the college. While data sharing exists, the Department makes sure that only summary and aggregate data is shared and no UI related PII is given directly to any entity. These relationships have allowed the Department to provide better research on our workforce system. The Department is also working on establishing a MOU with the K-12 system, which also requires the establishment of a MOU with the Department of Justice to obtain driver's licensing records due to the absence of SSNs on the K-12 system database.

## D. Privacy Safeguards

Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.

Montana follows the guidance on handling and protection of personally-identifiable information (PII) provided in TEGL 39-11. Social Security Numbers, in most fields in the MWorks automated system have been replaced with client identification numbers. Social Security Numbers have been removed from printouts in MWorks and staff have been trained to protect PII in paper form and in the transfer of PII across programs. Additional security measures regarding the system are in place and are evaluated on a continual basis

## 7. Priority of Service for Veterans

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.

Montana Job Service Centers offer priority of service to all covered persons who access the workforce system. Covered persons will be identified at point of entry to allow them to take full advantage of priority of service. Customers entering a Job Service Center will be queried in the customer reception area (point of entry) to ascertain covered person status. A customer that self-attests to be a veteran or spouse of an eligible veteran (covered person) will be offered the opportunity to step to the front of the line and receive services before a non-covered customer. At that time, the covered person will be made aware of their entitlement to priority of service, employment and training services available and eligibility requirements for available employment and training services.

Job Service AJC staff will conduct a screening for each Veteran/Eligible Spouse at point of entry to a Job Service AJC. Throughout the intake process, Veterans who disclose or self-attest to meeting one or more of the criteria for DVOP services will be referred to a DVOP. If a DVOP is not available when a referral is necessary, the Veteran/Eligible Spouse may choose to be served on a priority basis by another staff member.

Veterans not meeting the criteria for DVOP services are to be referred to appropriate non-JVSG staff to receive core, intensive, and/or training services on a priority of service basis.

Job Service will monitor priority of service to veterans/eligible persons to ensure that all staff follow the statutory and regulatory requirements regarding all Department of Labor programs. Priority of service will be monitored through analysis of data found in the Employment and Training Administration's Federal Reports, from observations annotated in the Manager's Quarterly Report on Services to Veterans and from reports completed by Job Service Systems Management Staff. These reports are reviewed by the State Veterans' Program Manager. Employment and Training and conclusions drawn regarding the extent of priority of service demonstrated by each Customer Service Area. Process improvement plans are recommended for those offices needing improvement.

## 8. Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

The state of Montana certifies its One-Stop system no less than once every three years and that certification includes scoring on universal accessibility and outreach to populations with barriers. The state's One-Stop Certification Policy is located here:

<http://wsd.dli.mt.gov/Portals/56/Documents/WSDPolicy/One-stop%20Certification%20Policy.pdf?ver=2018-10-18-093408-127>.

In addition to the state's One-Stop Certification, the state's Equal Opportunity (EO) Officer visits each service provider to thoroughly evaluate sites based on the US Department of Labor's EO monitoring instrument ADA Checklist for Existing Facilities. The checklist is located here:

<https://www.ada.gov/rachec.pdf>. Sites that are out of compliance with ADA standards are required to submit a compliance plan and timeline for implementation.

Programmatic accessibility is also monitored by the state's Equal Opportunity Officer who designed a monitoring instrument with input from other states and the US Department of Labor's Civil Rights Center. The instrument addresses programmatic accessibility and universal access to services provided in Montana's One-Stop System. In addition to monitoring for accessibility, the Equal Opportunity Officer designs training for service providers and continually looks for additional resources to support a fully-integrated and accessible One-Stop System.

In addition to monitoring the physical locations and programmatic accessibility in Montana's One-Stop System, the Equal Opportunity Officer reviews data and statistics about customers using Montana's public workforce system. The data is reviewed to ensure providers are equitably serving populations throughout the state. Specific populations include, but aren't limited to:

- Women;
- Minorities;
- Age groups; and
- Those who self-report disability.

## 9. Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

The Research and Analysis Bureau of the Department of Labor & Industry conducted an analysis of the languages spoken in Montana using the 2010 census on Population and Housing and the 2000 Montana census data on selected demographic characteristics. This analysis showed Spanish as the third predominant language with the Native North American language second and English first. The analysis shows that those that speak the Native North American language speak English outside the household where the Spanish-speaking individuals do not speak English outside the household. Based on this information, Montana posts notices in English and Spanish throughout the One-Stop System.

The state provides equal access programs to persons of limited English speaking ability and provides translation services. Universal access is provided through various bilingual services including, but not limited to, Language Line and other approved internet access sites provided in one-stop centers and service providers sites located across the state. Individuals seeking or receiving WIOA services may (but are not required to) provide their own interpreters. However, as this may become a confidentiality issue, Montana's WIOA service providers make every attempt possible to provide interpreters for those non-English speaking individuals seeking workforce services. The State Equal Opportunity Officer surveyed service providers throughout Montana for resources available to provide interpretative services to those with limited English speaking abilities. The state is aware of, and uses, the following interpreter resources:

- The Montana United Indian Alliance;
- Montana's University System;
- Approved language websites;
- Language Line; and
- Private interpreters across the state.

## IV. Coordination with State Plan Programs

Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the Unified or Combined State Plan.

The state of Montana's goals and vision are centered around the further development of an aligned, accessible, and accountable public workforce and talent development system. Coordination and planning across core programs and other partners occurs at the state level, and additional collaboration and coordination happen at the local level with core and community-based partners.

Statewide leadership, guidance, and collaboration have established the foundation of an integrated public workforce and talent development system, and the state of Montana intends to build on that foundation by implementing the following strategies:

- Data alignment through system development;
- Cross training across partners; and
- Coordinated and strategic business engagement.

#### DATA ALIGNMENT:

All core programs currently use LMI to serve clients and ensure that training and career development strategies are aligned to industry needs in the area. The common use of LMI to serve businesses and individuals in Montana's public workforce and talent development system allows for seamless service delivery across programs to help individuals transition into training, education, or employment and develop talent to support business and economic growth.

In addition to the common use of LMI, the state of Montana continues to design an integrated system to coordinate client and business service data within an integrated case management system. Integrated systems across partners will improve customer service delivery and further the development of a holistic case management approach that allows customers to move between programs seamlessly and will allow for additional braiding of funds across partners to meet individual customer needs. The integrated case management system will also improve business services across partners by allowing partners to track business engagement and work together to develop targeted engagement and better serve the businesses and industry in their area.

#### CROSS TRAINING ACROSS PARTNERS:

The state of Montana will continue providing training opportunities at the state and local level for partners to learn about partner programs and how the programs can work together to best serve clients in the public workforce and training system. Cross training will build a better understanding of partner programs and allow for seamless service delivery across partners and ensure that programs aren't duplicating efforts. In addition, a better understanding of core programs will allow partners to establish common regional goals, and strengthen relationships with other partners to better meet regional economic needs.

#### COORDINATED AND STRATEGIC BUSINESS ENGAGEMENT:

The state of Montana will continue growing its statewide business engagement strategy by coordinating across partners at the regional level to meet business challenges and ensure continued economic growth. In addition to tracking business services through the integrated case management system and using LMI to understand state and regional economies, the state of Montana will work on the following:

- Develop an education strategy for partners on the assessment of data to understand business cycles to proactively assist businesses and help with layoff aversion before a rapid response event;
- Grow sector strategies and partnerships at the state and regional level to identify skills, credentials, and education required for occupations within sectors; and

- Work collaboratively across partners to identify education and training partners that are able to work with clients to develop the skills and attain the training necessary to succeed in the workforce.

## V. Common Assurances (For All Core Programs)

The Unified or Combined State Plan must include assurances that:

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes

The State Plan must include	Include
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

## VI. Program-Specific Requirements for Core Programs

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

### Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B—

#### a. General Requirements

##### 1. Regions and Local Workforce Development Areas

###### A. Identify the regions and the local workforce development areas designated in the State

In order to best serve Montanans and meet the workforce needs of the state, Montana operates under a waiver as a single workforce planning area. Given the state's vast geography, low population and tri-agency structure housing the WIOA core programs, each partner issues policy to their local service sites. However, with the passage of WIOA, the core partners; human services, education, and economic development partners are working together to ensure that services are coordinated and aligned; including participation in partner conferences and joint strategy and planning activities.

The resolution of Montana's CEP/BOS issues requires that Montana maintain the original boundaries of the CEP. Therefore, funding for adult, dislocated worker, and youth programs does take into account the local area in its allocation. The SWIB serves as both the local and state board for all statewide planning purposes.

Through integrated partnerships with business, education, community leadership, and workforce programs, Montana core partners participate in Community Management Teams (CMTs), which serve as the state's local workforce organizations. Montana currently has 19 active CMTs, which were originally developed as a group of one-stop partners, community members, local businesses, economic development representatives, and other community-based partners. The groups have elected officers and meet on a monthly or quarterly basis. The CMTs identify community needs and work together to plan needed workforce development and partner services to meet the community's specific needs.

In order to best meet regional workforce needs, the state allocates funding using 12 regions outlined by the Montana Association of Counties (MACo). County commissioners and other local leaders are encouraged to participate on CMTs to ensure the local workforce needs are met and understood by those working to train the workforce.

**B. Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions**

The State of Montana is a single-area planning state and operates as such under a waiver from USDOL which allows the SWIB to serve as both the local and state board. Montana recognizes a prior-designated 10-county area formed under WIA through the Concentrated Employment Program (CEP) and the remaining 46 counties as two local areas for funding purposes; however, the state continues to plan and coordinate workforce development activities statewide.

The state of Montana continues engagement with local elected officials and associations representing counties and municipalities throughout the state on workforce development issues. In addition, the SWIB membership has local elected officials who engage statewide with MACo and nationally with NACo on local workforce development issues and trends.

The state of Montana has policies and procedures in place for local governments to submit requests for local area designation. Should the state receive a request for local area designation the application will go to the SWIB and the Governor for his consideration. The application requests an analysis of local labor market needs, economic development needs, and an assurance that the applicant has access to federal and nonfederal resources to administer activities required under WIOA.

**C. Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of local areas**

An area, board, or entity seeking designation as a local workforce development area can choose to appeal a denial. An appeal must be submitted in writing either by mail or email to the following address(s) within 14 days after the written notification of the decision.

Montana State Workforce Innovation Board  
PO Box 1728  
Helena, MT 59624-1728

Or

The appeal must include the justification for the appeal in the request. The area, board, or entity also has the right to request a hearing.

The appeals procedure will allow for a review before the SWIB Executive committee if requested and a decision will be made within 60 days of appeal. This will be a final decision and the area, board, or entity will be unable to reapply for one year from the date of final notification by the state.



## D. Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding

The state of Montana includes its appeal and dispute resolution process for infrastructure funding within its partner memorandum of understanding it reads as follows:

Dispute and Impasse Resolution for IFA: All parties will actively participate in IFA negotiations in a good faith effort to reach agreement. Any disputes shall first be attempted to be resolved informally. Should informal resolution efforts fail, the process outlined in the "Dispute Resolution" section above must be followed. If partners have employed the dispute resolution process and have failed to reach consensus on an issue pertaining to the IFA, then an impasse is declared, and the State Funding Mechanism is triggered.

- Step 1: Notice of Failure to Reach Consensus Given to Governor: If the parties cannot reach consensus on methods of sufficiently funding an American Job Center's (AJC) infrastructure costs and the amounts to be contributed by each partner program, the SWIB (or designee) is required to notify the Governor.
- Step 2: Negotiation Materials Provided to Governor: The SWIB Chair (or designee) must provide the appropriate and relevant materials and documents used in the negotiations to the Governor, preferably at the time of the notification of failure to reach consensus, but no later than 5 business days thereafter. At a minimum, the SWIB Chair (or designee) must provide to the Governor:
  - The State Plan;
  - The cost allocation methodology or methodologies proposed by the partners to be used in determining the proportionate share;
  - The proposed amounts or budget to fund infrastructure costs;
  - The amount of partner funds included;
  - The type of funds (cash, non-cash, and third-party in-kind contributions) available (including all documentation on how partners valued non-cash and third-party in-kind contributions consistent with 2 CFR 200.306);
  - Any proposed or agreed on AJC budgets (for individual centers or a network of centers); and
  - Any partially agreed upon, proposed, or draft IFAs.
  - The SWIB (or designee) may also provide the Governor with additional materials that they or the Governor find to be appropriate.
- Step 3: Governor Determinations and Calculations: The Governor will:
  - Determine AJC infrastructure budget(s);
  - Establish cost allocation methodology(s);
  - Determine Partners' proportionate shares;
  - Calculate statewide cap;
  - Assess the aggregate total of infrastructure contributions as it relates to the statewide cap; and
  - Adjust allocations.

- Once all determinations and calculations are completed, the Governor will notify the SWIB Chair (or designee) of the final decision and provide a revised IFA for execution by the parties.
- Step 4: IFA Execution: The IFA becomes effective as of the date of signing by the final signatory. Programs may appeal the Governor's determination of the infrastructure cost contributions in accordance with the process established under 20 CFR 678.750, 34 CFR 361.750, and 34 463.750.
- Step 5: Appeal Process: Should the program wish to appeal the Governor's determination of the infrastructure cost contributions it must submit its appeal within 30 days to the SWIB. The SWIB's Executive Committee will make its decision within 60 days of the receipt of the appeal. The SWIB's decision is final.

## 2. Statewide Activities

### A. Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities

The state of Montana provides policy guidance governing the state's public workforce and talent development system in compliance with all local, state, and federal laws. The state statute that governs the state's Department of Labor are contained in Title 39 of the Montana Code Annotated. All WIOA policies are posted online here: <http://wsd.dli.mt.gov/wsd-policy#WIOA-2385>.

### B. Describe how the State intends to use Governor's set aside funding. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers

Because the state of Montana receives minimal funds to administer its WIOA programs, the majority of the Governor's set aside funding is used for program operations and compliance, including, but not limited to:

- Board administration;
- Fiscal administration;
- Program monitoring and compliance; and
- Reporting and compliance with ongoing changes to the PIRL.

The remainder of the Governor's set aside will be used to support specific initiatives identified by the Governor. Currently the funding is provided to prospective students who started a degree program through the Montana University System, but did not graduate, and who are not eligible for services under WIOA programs.

The state of Montana does not use the Governor's set aside funds for rapid response or layoff aversion, rather the state of Montana sets aside 25% of its Dislocated Worker funds for Rapid Response activities. Largely, the state of Montana relies on local relationships within the business and economic development communities to identify businesses at risk of or in the process of downsizing or closing. As those potential layoff events are identified, the Montana Department of Labor & Industry coordinates a local response with providers to eliminate or reduce the impact of the layoff.

The state of Montana continues to engage the U.S. Department of Labor on the development of a policy and funding framework that allows states to proactively coordinate and support businesses that will experience a downturn leading to layoffs.

### C. In addition, describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities

In the event of a disaster declaration, DLI coordinates with the Governor's Office, FEMA and appropriate state agencies to deliver Rapid Response services to businesses and workers impacted by the disaster. During a disaster declaration, the Rapid Response services are coordinated through Job Service Operations Bureau and local office staff coordinate with the Rapid Response team to provide information and services to impacted workers. Team members are assembled to meet the community and individual needs of the impacted workers.

### D. Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the State disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

In Montana, trade-impacted workers receive Trade Adjustment Assistance (TAA) information and services through Rapid Response, Dislocated Worker, and Wagner-Peyser programs. These programs are operated statewide by DLI. Field staff coordinate all Rapid Response Activities, help businesses or workers file TAA petitions, and bring a variety of state and local service providers together for inter-agency Rapid Response workshops.

Co-enrollment of TAA clients in the WIOA Dislocated Worker program - as well as in other programs for which they are eligible - is the standard approach in Montana. State policy requires assessment to develop an appropriate Individual Employment Plan and TAA services, including determination of need and justification for TAA-approved training. In addition to structured interviews, case manager's use a variety of formal assessment tools, including (but not limited to):

- Education assessments designed by the Adult Education Program;
- Assessments within the Montana Career Information System; and
- ESkill proficiency tests.

Rapid Response services are provided to all workers experiencing layoffs. During the Rapid Response workshop, staff informs workers of the following services available to them:

- How to start a UI claim;
- Title I workforce services available to them;
- TAA benefits; and

- Community resources.

After the Rapid Response workshop and once staff is aware of the TAA petition they share additional program information and assist the impacted workers one-on-one to provide information about benefits and services offered through the program.

## b. Adult and Dislocated Workers Program Requirements

### 1. Work-Based Training Models

If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

The state of Montana supports on-the-job training (OJT) as an important training service for WIOA clients to receive the skills necessary to transition into meaningful employment. Work-based training provided to Montanans using WIOA funds must be designed for higher skilled occupations and are not designed to subsidize low-skilled occupations that require little training time.

Prior to the establishment of an OJT contract, employers are screened to ensure the job provides a wage that meets the participant's needs and to ensure the employer meets all regulatory aspects to be eligible for OJT funds. The length of OJT training is determined through research of the O\*Net system to identify the complexity of the specific job in conjunction with the participant's current level of skill in that occupation.

The Incumbent Worker Training Program is a competitive grant that provides funding to help eligible Montana businesses with less than 50 employees statewide purchase skills-based training for current (incumbent) workers residing in Montana. Training can be customized to meet specific employer needs. The training must be skill-based or result in a certificate or credential, and must improve the productivity, efficiency or wages in the workers' existing jobs. Training should be short-term and the business must have a demonstrated need for the training as a way to remain competitive in their industry or the global economy.

### 2. Registered Apprenticeship

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

Montana's Registered Apprenticeship program has thirteen staff, and five are based in different job service offices that work regionally to serve the entire state. Those representatives participate in weekly staff meetings with WIOA program managers. In addition, Montana's Registered Apprenticeship program includes WIOA program managers in its outreach efforts and works to identify apprentices that may be eligible for WIOA programs to ensure successful completion of a registered apprenticeship program.

In addition to the colocation of the five staff at job service offices, the state registered apprenticeship program provides staff, resources, and outreach to larger statewide workforce engagement, which may include participation in rapid response efforts and coordination with the dislocated worker program.

Montana's registered apprenticeship program also coordinates with partners in conducting outreach and program design on Montana's seven Indian reservations. The program anticipates continued growth statewide and its working to cultivate additional relationships with employers and industry associations in order to grow occupations and increase the capacity for apprentices.

### 3. Training Provider Eligibility Procedure

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

Entities Qualified to Apply to be on the ETPL:

- The following types of training providers are able to submit an application to receive WIOA Title funds to provide training to clients.
  - Institutions of higher education that provide a program of training that leads to a recognized postsecondary credential;
  - Entities that carry out programs registered under the National Apprenticeship Act;
  - Public or private training providers, including community-based organizations, joint labor management organizations, pre-apprenticeship programs that provide training, and occupational or technical training; and
  - Providers of adult education and literacy activities provided in combination with occupational skills training.
- Registered Apprenticeship programs are exempt from most of the ETPL requirements.

Process for all Providers except Registered Apprenticeship Programs: Beginning October 1, 2015, training providers must apply for Montana's ETPL by submitting an application for initial program eligibility. Eligibility will be granted for one year. Training providers may apply for initial program eligibility throughout the year. Programs will be placed on the ETPL effective the date they are approved.

- A training-service provider applying for Montana's ETPL will submit the application for initial eligibility found on <https://montanaworks.gov/> and a W-9 to the Montana Department of Labor & Industry. :
  - The type of training entity, such as institution of higher education or public or private providers of training services.
  - The name and a short description of each program of training services to be offered. The description may include course prerequisites and learning outcomes.
  - The potential outcome of training services; i.e. industry-recognized certification or unsubsidized employment during 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit and credential attainment. Whether the provider partners with a specific business.
  - Alignment of training services with in-demand industry sectors and occupations.
  - Other information may be required; i.e. information related to the quality of training services that lead to a recognized post-secondary credential.
  - Social Security Numbers for all students, regardless of funding source.
- Montana Department of Labor & Industry will review complete applications to determine eligibility. Once approved in Montana, training providers will be eligible for WIOA funding.

## Continued Eligibility for all Training Providers except Registered Apprenticeship Programs:

- Training providers must submit applications for continued program eligibility annually and will expire one year from the approval date.

- Training providers applying for continued program eligibility must provide the verifiable, program-specific performance information requested on <https://montanaworks.gov/> to be considered for Montana's ETPL,
- The continued eligibility application is required for any program that has previously been on the list. Dropping off the lists for a period of time does not return a program to an initial eligibility status.
- The training provider may not receive WIOA funds until the provider is approved to be on the ETPL.
- Program-specific data submitted by Eligible Training Providers (ETPs) to the state is a requirement of continued eligibility and must include the following:
- Primary indicators of performance for activities provided under the Adult and Dislocated Worker programs:
  - - The total number of WIOA program clients who are in unsubsidized employment through wage record match or other supplemental means during the second quarter after program exit;
    - The total number of WIOA program clients who are in unsubsidized employment through wage record match or other supplemental means during the fourth quarter after program exit;
    - The median earnings of all WIOA program clients who are in unsubsidized employment during the second quarter after program exit. This indicator also includes WIOA participants who are verified to be self-employed.
    - The total number of WIOA program clients who obtained a credential within one year after exit from the program. This includes:
      - WIOA program clients who attained a recognized post-secondary credential during the program or within one year after program exit; OR
      - WIOA program clients who attained a secondary diploma or its recognized equivalent during the program or within one year after exit AND were also employed or enrolled in an education and training program leading to a recognized post-secondary credential within one year after program exit.
  - Information identifying the recognized post-secondary credentials received by WIOA clients;
  - Program cost information, including tuition and fees, for WIOA clients in the program;
  - Information specifying levels of performance achieved by all program individuals (WIOA and non-WIOA) who engaged in a program of study;
  - The total number of individuals enrolled in program during the reporting period;
  - The total number of individuals who completed, withdrew, or transferred from this program during the reporting period;
  - The total number of individuals who did not withdraw or transfer from this program during the reporting period;

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- The total number of individuals who are in unsubsidized employment through wage record match or other supplemental means during the second quarter after program exit;
- The total number of individuals who are in unsubsidized employment through wage record match or other supplemental means during the fourth quarter after program exit;
- The median earnings of all individuals who are in unsubsidized employment during the second quarter after exit from the program. This includes all program clients who are verified to be self-employed.
- The total number of all program clients who obtained a credential within 1 year after exit from the program. This includes:
  - Individuals who attained a recognized post-secondary credential during the program or within one year after program exit; OR
  - Individuals who attained a secondary diploma or its recognized equivalent during the program or within one year after exit AND were also employed or enrolled in an education and training program leading to a recognized post-secondary credential within one year after program exit.
  - The average earnings of all individuals in the program of study who are in unsubsidized employment during the second quarter after exit.
  - The average earnings of all individuals in the program of study who are in unsubsidized employment during the fourth quarter after exit.
  - If no data is available, the provider must start tracking required data and submit all data the first full quarter after placement on the list.

#### Registered Apprenticeship Programs:

- Registered Apprenticeship program sponsors and the any training provider the sponsor is utilizing that request to be ETPs are automatically included on the list and will remain as long as the program is registered or until the program sponsor notifies the state that it no longer wants to be included on the list. Registered Apprenticeship programs are not subject to the same application and performance information requirements or initial eligibility procedures owing to the detailed application and vetting procedure to become a Registered Apprenticeship program. The following information will be required from all current and future Registered Apprenticeship programs:
  - Occupations included within the Registered Apprenticeship program;
  - The name and address of the Registered Apprenticeship program sponsor;
  - The name and address of the related technical instruction provider, and the location if different from sponsors' address;
  - The method and length of instruction;
  - The number of active apprentices; and
  - A form W-9 for the sponsor.
- Any Registered Apprenticeship program sponsor taking an application is to be considered an in-demand occupation by default.
  - Pre-apprenticeship programs do not have the same automatic ETP status.

#### 4. Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program

The state of Montana implemented the additional adult priority of service for individuals who are basic skills deficient in July of 2015. Priority of service requirements are reflected in the Title I Adult and Dislocated Worker Program Policy, which is located on the Workforce Services Division's policy site here: <http://wsd.dli.mt.gov/wsd-policy#WIOA-2385>.

The state of Montana monitors each service provider once a year and this includes monitoring for priority of service for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient. Monitoring includes a review of documentation in participant files reflecting that individuals fit the priority of service requirements and that all required documentation proving the priority is in place. All WIOA Title I Adult participants must meet one of the priority of service categories in order to receive services.

#### 5. Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs

Montana's Dislocated Worker funds are contracted by the SWIB to one service provider that provides services throughout the state to both local areas. Funds are not restricted by MACo district and can be used in each area based on need. Montana does not allow for transfer of funds between the Adult and Dislocated Worker programs. Montana's WIOA Funding Allocation Policy is located here: <http://wsd.dli.mt.gov/wsd-policy#WIOA-2385>

### c. With respect to youth workforce investment activities authorized in section 129 of WIOA—

With respect to youth workforce investment activities authorized in section 129 of WIOA—

#### 1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants or contracts.[11]

[11] Sec. 102(b)(2)(D)(i)(V)

The state of Montana issues RFPs for the WIOA Title I Youth Program in accordance with federal and state procurement law. Montana's SWIB serves as both the state and local board under a waiver and the Management Services Division under the Montana Department of Labor & Industry serves as the administrative entity for the SWIB and issues the RFPs on behalf of the board. The RFPs are



awarded to the 12 MACo Districts throughout the state, which are within Montana's two local areas; a map of the MACo Districts is here: <http://www.mtcounties.org/events/maco-district-meetings/>. Providers competitively bid for the RFPs and there are currently 10 providers serving both local areas and all 12 MACo Districts. The criteria for the WIOA Title I Youth Program is developed in coordination with the board and encompasses all the program requirements as set by the US Department of Labor.

The state of Montana developed criteria for grant awards including, demonstrated effectiveness of serving youth populations, financial stability, fiscal accountability, cost effectiveness, local factors, qualifications and expertise of staff, and demonstrated linkages with other youth services providers, schools and employers.

WIOA Title I Youth providers are monitored annually for performance and accountability. The performance measures are set by the US Department of Labor, and the state of Montana includes indicators within its Youth Policy located here: <http://wsd.dli.mt.gov/wsd-policy#WIOA-2385>.

In addition to the US Department of Labor performance indicators, the SWIB set out additional performance indicators, which include:

- Measuring cost per participant, which the board capped at \$5,980; and
- Measuring the number of participants in training, which is above US Department of Labor's requirements.

## 2. Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.

WIOA Title I Youth service providers coordinate services for out-of-school youth with a number of partners including, but not limited to:

- Adult Education (statewide);
- Vocational Rehabilitation (statewide);
- Adult Title I programs (statewide);
- Jobs for Montana's Graduates (statewide);
- Juvenile justice and probation programs (statewide)
- Public assistance programs, including, but limited to:
  - Supplemental Nutrition Assistance Program (SNAP) (statewide); and
  - Temporary Assistance for Needy Families Program (TANF) (statewide)
- Youth homeless and runaway programs (statewide, though programs vary in scale throughout the state);
- Post-secondary education (statewide);
- YouthBuild (MACo District 8);
- JobCorps (MACo District 12 and District 10)

In addition to coordination of services with partners, WIOA Title I Youth service providers also refer participants to partner programs and offer supportive services to participants to help ensure youth are supported throughout training or degree attainment. In addition to WIOA Title I Youth funds service providers also braid funding streams from other youth-based programs and community-based partnerships supporting disadvantaged youth.

WIOA Title I Youth providers have strong relationships with education systems within the district it serves. These relationships are critical as educators, principals, superintendents, and career and guidance counselors have established relationships with students and help caseworkers both target out-of-school youth and help participants transition back into education systems as appropriate.

### 3. Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element. [12]

[12] Sec. 102(b)(2)(D)(i)(I)

WIOA Title I Youth providers ensure that all 14 program elements are available to participants; however, providers have discretion of determining what specific elements are provided based on the individual objective assessment and individual service strategy developed with the participant. In order to ensure there isn't duplication of service, providers coordinate with partners in their area whenever possible to best support the participant.

The state of Montana requires a provider agreement that includes scope of services detailing how the provider will ensure the 14 program elements are successfully delivered to participants based on need. The state of Montana monitors each provider annually to ensure the services are provided. In addition, the state of Montana includes the 14 program elements in its youth policy.

### 4. Provide the language contained in the State policy for “requiring additional assistance to enter or complete an educational program, or to secure and hold employment” criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for “requiring additional assistance to complete an education program, or to secure and hold employment” criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII). If the state does not have a policy, describe how the state will ensure that local areas will have a policy for these criteria.

An Out-of-School Youth (OSY) is defined as:

- Youth who is not attending any school, including youth in home schools that are not registered with the county superintendent;
- Not younger than 16 nor older than 24 at the time of enrollment. Because age eligibility is based on age at enrollment, clients may continue to receive services beyond the age of 24 once they are enrolled in the program; and

- One or more of the following:
  - A school dropout;
  - A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar quarter is based on how a local school district defines its school year quarters.
  - A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner;
  - An individual who is subject to the juvenile or adult justice system;
  - A homeless individual, aged 16 to 24, which may include a runaway youth;
  - Youth in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption;
  - A youth who is pregnant or parenting;
  - An individual with a disability; or
  - A low-income youth (16-24) who requires additional assistance to:
    - Enter or complete an educational program; a youth who is in need of a high school diploma; or has dropped out of a post-secondary educational program during the last 12 calendar months; or has a diploma but requires additional education in order to obtain or retain employment.
    - OR
    - Secure and hold employment: a youth (including a youth with a diploma or equivalent) not currently attending any school and who has not held a full-time job for more than three consecutive months; has a poor work history, to include no work history; has been fired from a job in the last six calendar months; or lacks work readiness skills necessary to obtain and/or retain employment.

**In-School Youth (ISY) is defined as:**

- Attending any school at program entry, including youth attending secondary school, post-secondary school, an alternative school or registered home school;
  - WIOA does not consider providers of Adult Education under WIOA Title II, Youth Build programs, and Job Corps programs to be schools.
- Not younger than age 14 or (unless an individual with a disability who is attending school under State law) older than age 21 at the time of enrollment. Because age eligibility is based on age at enrollment, clients may continue to receive services beyond the age of 21 once they are enrolled in the program;
- A low-income individual; and
- One or more of the following:
  - Basic skills deficient;
  - An English language learner;
  - An offender;
  - A homeless individual, aged 14 to 21, which may include a runaway youth;

- Youth in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption;
- A youth who is pregnant or parenting;
- An individual with a disability; or
- A youth (14-21) who requires additional assistance to:
  - Complete an educational program: a youth who is at risk of dropping out of high school as documented by his/her school; or had previously dropped out of an educational program but has returned to school (including an alternative school); has below average grades; or a youth with poor attendance patterns in an educational program during the last 12 calendar months; or has been suspended or expelled from school within the last 12 calendar months; or has previously been placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months.
  - OR
  - Secure or hold employment: an in-school youth who has not held a job for more than three consecutive months; or has a poor work history to include no work history; or has been fired from a job in the last 6 calendar months; or lacks work readiness skill necessary to obtain and/or retain employment.
  - Note: In each local area, not more than 5 percent of the ISY newly enrolled in a given program year may be eligible based on “requires additional assistance to complete an educational program or to secure or hold employment.”

5. Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define “not attending school” or “attending school,” indicate that is the case and provide the state policy for determining whether a youth is attending or not attending school.

Montana defines attending school as youth 7-16 that are enrolled in and attending school full-time. Youth that are home schooled or enrolled in a private school are considered to be “attending school” if they have registered or provided notification to the Superintendent within their county of their intent to be considered a school. “Not Attending School” youth under 16 and not attending school are considered to be truant; a youth 16 and over not attending school are considered to be a “drop-out.”

6. If using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State definition which must further define how to determine if an individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in

society. If not using the portion of the definition contained in WIOA Section 3(5)(B), indicate that is the case.

Montana uses the basic skills deficient definition contained in WIOA.

Basic Skills Deficient (*Youth Eligibility Barrier*) – means a youth:

- that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
- an out-of-school youth who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society.

OSY must be assessed for basic skill deficiencies. The instrument used to assess basic skills is the TABE 11/12. It must be administered by an Adult Education provider funded through Montana's Office of Public Instruction or by a WIOA Title I provider who has permission to administer the test on behalf of Adult Education. This process applies to:

- OSY without a diploma or the equivalent at the time of enrollment, because they dropped out of school; or are within the age of compulsory school attendance, but have not attended school for at least the most recent complete school year quarter.
- OSY with a diploma or the equivalent and basic skills deficiencies at the time of enrollment.
- Note: Pretesting OSY with a diploma and basic skills deficiencies is not necessary. However, youth providers should work with the Adult Education provider to determine if post-testing is appropriate.

Once an OSY has tested basic skills deficient they work with an Adult Education provider to improve deficiencies and retest as necessary until they are no longer deficient. In addition, Adult Education tutors students to improve test scores and remove that barrier.

## d. Single-area State Requirements

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include—

1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)
2. The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)
3. A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)

Not applicable.

4. A description of the roles and resource contributions of the one-stop partners.

Not applicable.

5. The competitive process used to award the subgrants and contracts for title I activities.

Not applicable.

6. How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.

Not applicable.

7. How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.

Not applicable.

8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.

Not applicable.

## e. Waiver Requests (optional)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;

2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;
3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;
4. Describes how the waiver will align with the Department's policy priorities, such as:
  - A. Supporting employer engagement;
  - B. Connecting education and training strategies;
  - C. Supporting work-based learning;
  - D. Improving job and career results, and
  - E. Other guidance issued by the department.
5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and
6. Describes the processes used to:
  - A. Monitor the progress in implementing the waiver;
  - B. Provide notice to any local board affected by the waiver;
  - C. Provide any local board affected by the waiver an opportunity to comment on the request;
  - D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
  - E. Collect and report information about waiver outcomes in the State's WIOA Annual Report.
7. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

The state of Montana is not submitting waiver requests as part of its state plan.

## Title I-B Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	No
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	No
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	No
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

## Adult Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.



For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to

serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	71.0%	71.0%	71.0%	71.0%
Employment (Fourth Quarter After Exit)	70.0	70.0	70.0	70.0
Median Earnings (Second Quarter After Exit)	\$5,913	6,159	\$5,913	6,159
Credential Attainment Rate	53.0%	53.0%	53.0%	53.0%
Measurable Skill Gains	58.0	58.0	58.0	58.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## Dislocated Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State

having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish

negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	71.0	71.0	71.0	71.0
Employment (Fourth Quarter After Exit)	70.0	70.0	70.0	70.0
Median Earnings (Second Quarter After Exit)	\$7,000	\$7,000	\$7,000	\$7,000
Credential Attainment Rate	53.0%	53.0%	53.0%	53.0%
Measurable Skill Gains	56.0	56.0	56.0	56.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## Youth Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);

- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	60.0	60.0	60.0	60.0
Employment (Fourth Quarter After Exit)	55.0	55.0	55.0	55.0
Median Earnings (Second Quarter After Exit)	3,200	3,200	3,200	3,200
Credential Attainment Rate	59.0%	50.5	59.0%	50.5
Measurable Skill Gains	50.0	50.0	50.0	50.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

## Program-Specific Requirements for Wagner-Peyser Program (Employment Services)

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

### a. Employment Service Staff

1. Describe how the State will staff the provision of labor exchange services under the Wagner-Peyser Act, such as through State employees, including but not limited to state merit staff employees, staff of a subrecipient, or some combination thereof.

The state of Montana will continue using state merit staff for administration of its Wagner-Peyser programs.

2. Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both jobseekers and employers

Staff receive ongoing training on all Wagner-Peyser program services. Training is provided face-to-face, via webinar and/or recorded and stored online for staff to view at their convenience. Wagner-Peyser staff are cross-trained on all programs to maximize staff availability and ensure that job seekers and employers receive the best possible services. Each office has subject matter experts who train each other and conduct cross-training in staff meetings. All staff understand WIOA Title I, Title II and Title IV basic program eligibility criteria and how to make referrals to partner programs. Online tools available for use by Wagner-Peyser staff during job seeker intakes and assist staff in identifying possible referral options including those to WIOA required partners.

The following training sessions are available to field staff at least annually:

- Business Services;
- WIOA Technical Assistance (monthly);
- Veteran Services; and
- Migrant Seasonal Farmworker Services and H2A/H2B employer services.

When staff identify training needs, specialized training is developed and delivered, or training is identified and provided externally. Recent specialized training was delivered on assisting ex-offenders, business outreach, client intake, continuum of service to clients, documenting services delivered to job seekers and businesses, and Unemployment Insurance (UI) Services, Reemployment Services and Eligibility Assessment (RESEA) training.

RESEA training is provided to all Wagner-Peyser staff and covers basic UI eligibility requirements, issue identification, fact-finding tools, and UI work search requirements. In addition, Wagner-Peyser staff receive ongoing training opportunities, such as the required RESEA appointments to provide basic and individualized Wagner-Peyser services to job seekers and UI claimants.

Montana's Wagner-Peyser staff provide customized business services designed to increase work-based learning opportunities such as registered apprenticeship, WIOA Title I-funded on-the-job training, and Incumbent Worker Training. Montana Wagner-Peyser staff connect local businesses to the Montana Registered Apprenticeship Program. In addition, Montana seeks opportunities to help employers increase productivity, employee engagement, employee recruitment, retention, and training by implementing new programs and pilot projects.

### **3. Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication**

At least annually, WIOA staff must complete training created by both UI and WIOA Program Managers. This training includes topics such as RESEA appointments, basic concepts of "able and available," benefit eligibility, documentation requirements and job- and union-attached claimants. Referrals of claimants to UI for adjudication as well as reporting of potential issues are also discussed in the UI training.

#### **b. Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through one-stop centers, as required by WIOA as a career service**

Workforce Consultants throughout the state are trained to provide general assistance and information to customers who have questions about filing a claim for unemployment compensation. Questions that require specific UI expertise are referred to the UI Claims Center for response.

Montana provides direct access to a UI representative in all workforce center offices and an online portal for UI claimants is available on the department's website that provides claimants with secure messaging and document upload functions.

## c. Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals

Job Service staff work with all UI claimants, except for job or union-attached claimants. In order to receive UI benefits, claimants must register with Job Service online or in-person within 10 days of filing a claim.

The state of Montana serves claimants in declining industries, ex-military claimants, and those at risk of becoming long-term unemployed through RESEA. The program includes:

- an orientation to services available at the office;
- a comprehensive assessment of the claimant's current situation and development of an individual employment plan, which includes:
  - identification of barriers;
  - identification of career and employment goals;
  - understanding the local labor market related to employment goals; and
  - identification of training needed to achieve employment.

The RESEA program aligns UI and workforce service resources to best serve clients.

Claimants may also receive comprehensive, specialized assessments and referral to Adult Education, JobCorps, registered apprenticeship programs or on-the-job training opportunities.

In addition to developing the individual employment plan, Job Service staff assist UI claimants with the Montana Career Information System (MCIS). MCIS provides many online assessments and resources for job seekers and allows job seekers to create an e- portfolio to store the results of all their assessments, create resumes, and explore occupations, education and training options. PEP Talk is a workbook used in conjunction with MCIS, that helps job seekers go through the career planning process to create an education and employment plan. Staff from Job Service, the Montana University System, and community-based organizations are trained to help clients navigate and interpret the results of their assessments.

DLI works continuously to improve workforce and UI program integration. In addition to those efforts reflected in the RESEA program, integration strategies include training for employment services staff on the UI claims intake and determination processes, additional training for all staff on identifying UI eligibility issues, and stronger coordination procedures for all staff, to ensure claimants who come into Job Service offices seeking assistance with their UI claims receive the best possible customer service.

## d. Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate including the following:

### 1. Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;

RESEA services, provided to UI claimants through initial appointments as well as continuing service provision, provide coordination and provision of labor exchange services through Job Service Montana offices. WP funds will be used to support UI claimants by providing job search and



placement services, including counseling, testing, occupational and labor market information, assessment and referral to employers as well as by providing services for workers who have received notice of permanent layoff or impending layoff, or workers in occupations which are experiencing limited demand due to technological change, impact of imports, or plant closures. WP funds will be used to administer the work test for the State unemployment compensation system; and providing job finding and placement services for unemployment insurance claimants; and providing unemployment insurance claimants with referrals to, and application assistance for, training and education resources and programs.

## 2. Registration of UI claimants with the State's employment service if required by State law;

Job Service staff work with all UI claimants, except for job or union-attached claimants. In order to receive UI benefits, claimants must register with Job Service online or in-person within 10 days of filing a claim. The process of filling a UI claim online requires the claimant to create a MontanaWorks.gov account. The account creation process gathers information which also meets the requirements for registration with Job Service.

## 3. Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and

The state of Montana serves claimants in declining industries, ex-military claimants, and those at risk of becoming long-term unemployed through RESEA. The program includes:

- an orientation to services available at the office;
- a comprehensive assessment of the claimant's current situation and development of an individual employment plan, which includes:
  - identification of barriers;
  - identification of career and employment goals;
  - understanding the local labor market related to employment goals; and
  - identification of training needed to achieve employment.

The RESEA program aligns UI and workforce service resources to best serve clients. Statewide delivery of intensive, personalized reemployment services results in reduced UI benefit durations.

Staff focus on providing career services that relate to the specific needs of each claimant. The assessment and referrals to reemployment services provided to UI claimants focus on identifying high-demand jobs and training opportunities available locally or regionally, that can lead to higher-paying, long-term jobs. Statewide delivery of intensive, personalized reemployment services results in reduced UI benefit durations. Staff in each Job Service office are trained and skilled in performing assessments, supporting claimants in local labor market information searches and can refer claimants to existing training opportunities in the area.

## 4. Provision of referrals to and application assistance for training and education programs and resources.

The state of Montana is working to develop an integrated work registration system that will populate customer information across Employment Services and UI databases and eliminate data duplication for customers and staff.

In addition to system integration, Wagner-Peyser staff are cross-trained on all programs to ensure claimants receive the best possible services. All staff understand WIOA Title I, Title II and Title IV basic program eligibility criteria and how to make referrals to partner programs. Online tools available for use by staff during job seeker intakes and assist staff in identifying possible referral options including those to WIOA required partners.

**e. Agricultural Outreach Plan (AOP).** Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include an assessment of need. An assessment need describes the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

**1. Assessment of Need.** Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

The state of Montana wrote section e. 1. 2. and 3 and all components together to best describe the state's farmworker population along with the agriculture mix of the state.

#### BACKGROUND:

The state of Montana's DLI serves and supports Migrant Seasonal Farm Workers (MSFW) the same way it serves and supports all clients using the public workforce system. Supporting the MSFW population in Montana is challenging because of the nature of the work and the difficulty accessing this population to holistically deliver services across agencies and partners.

Currently, the best estimate of migrant and seasonal farmworkers in Montana is based on the 2017 agriculture survey, estimating approximately 13,499 migrant and/or seasonal farmworkers in the state that worked for 7,322 farm or ranch employers. The estimate of agricultural workers shows little change between the peak season and low season, as the majority of agricultural workers for Montana are not a migrant community. The predominant demographic of a Montana agricultural worker is a Montana resident that does not travel significant distances for seasonal or temporary work, or is a year-round employee, and is English-speaking. However, there are a number of non-English-speaking agriculture workers whose primary language spoken is other than English, including Hmong and Spanish.

In order to best serve this population, the state of Montana coordinates outreach with the following partners:

- Rural Employment Opportunities (REO);
- Ag Worker Health & Services; and

- Montana Legal Services Association;

REO is Montana's National Farmworker Jobs Program (NFJP) grantee and there is a formal MOU between REO and the state of Montana defining roles and responsibilities and service coordination for the migrant and seasonal farmworkers. REO has staff located throughout the state who partner with the WIOA Title I providers to coordinate statewide services and outreach to migrant and seasonal farmworkers. REO staff conduct regular outreach activities resulting in individuals being referred to WIOA partners or other community-based organizations for services. In addition to serving individuals, REO also conducts employer outreach and engagement which has resulted in paid on-the-job training and work experience opportunities for qualifying MSFWs.

#### ASSESSMENT OF NEED:

The majority of Montana farm workers earn low wages. The average annual income for the Montana National Farmworker Jobs Program (NFJP) participant is less than \$6,200 annually. Many basic family needs such as nutrition, housing, health care, child care, and transportation are out of reach for farm worker families. As such, the state of Montana is committed to coordinating services for the MSFW population across partners to ensure this population receives the same services and supports that all clients using the public workforce system receive.

As stated above, the predominant demographic of a Montana agricultural worker is a Montana resident that does not travel significant distances for seasonal or temporary work, or is a year-round employee, and is English-speaking. As stated above, partners also serve MSFW populations throughout the state with limited English proficiency.

#### ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE:

Montana is a geographically large, diverse state with 16 Job Service offices serving migrant and seasonal farmworkers and conducting farmworker outreach. Montana's five economic regions have varied agriculture mix with different hiring and peak seasons based on the production within that region. Montana's five economic regions are:

- Northwest Region;
- Southwest Region;
- North Central Region;
- South Central Region; and
- Eastern Region.

#### Northwest Region:

In Montana's Northwest Region, the predominant crops are sweet cherries, alfalfa, and hay. The earliest activity involves planting alfalfa, and the hiring season for MSFWs typically lasts from June to September. Cherry harvest, which is particularly labor-intensive begins mid-July and ends in early August. Within the harvest months approximately 201 families are served which is approximately 862 individuals within those family units. Montana's cherry harvest is largely non-mechanized, thus there is an increased need for MSFW labor. Cherry harvest uses a larger volume of limited English proficient workers whose primary language is Spanish. Local job service staff work closely with Spanish-speaking staff from partner agencies to ensure that language does not pose a barrier to services.

#### Southwest Region:

In Montana's Southwest Region, the predominant crops are alfalfa hay, barley, and potatoes. The earliest activity involves planting potatoes in early March and harvesting in September and October. In addition, the Southwest region of Montana has extensive cattle-calf operations with the hiring season for calving beginning in February and lasting through late spring.

#### North Central Region:

Montana's North Central Region is known as the Golden Triangle area which predominantly grows wheat, barley and pulse crops (dry peas, garbanzo beans, chickpeas, lentils). Typically, producers hire for these seasons from mid-July to mid-September. In addition to crops, this region is also known for its cattle production with hiring typically taking place in February through late spring for calving season.

#### South Central Region:

In Montana's South Central Region, the predominant crops are wheat and barley much like the North Central Region. However, cattle operations as well as sheep operations are also predominant. The typical hiring season for calving and lambing lasts from February to late spring. Throughout the year, approximately 33 families are served within the region; however, the migrant workers hired in this region have different characteristics than those traveling through Montana with the cherry harvest in the Northwest Region.

#### Eastern Region:

Eastern Montana also produces wheat and pulse crops like other regions in Montana with similar harvest seasons. In addition, this region is known for its sugarbeet production. The harvest season for sugarbeets typically lasts from September to November.

The employment rates in agriculture are difficult to predict due to consistent unknown factors inherent to crop production and, at times, livestock production, therefore all hiring and peak seasons are estimated based on typical production year. Montana-based seasonal farm workers are typically employed for up to nine months of the year and often work in more than one type of production (both livestock and crops). Crop production in Montana is affected by a short growing season and it's not uncommon for planting to occur later than desired and harvest to take place earlier than desired due to snow fall. Most crops must be planted at certain times of the year, weeded, fertilized, harvested as they mature or ripen. Montana growers have employed a number of seasonal farm workers who sometimes will move from farm to farm, but most often workers will stay on with one employer for the entire season.

The official estimates of agriculture employment are derived from surveys of agricultural establishments that participate in the unemployment insurance system, and from the previous year's state income tax reporting for agricultural establishments. As a result, they are more likely to count permanent agricultural workers than migrant and seasonal farm workers. Many Montana growers and producers express the lack of agriculture workers available in their area. This results in an increasing rate of using the foreign labor H-2A program.

## 2. An assessment of the agricultural activity in the State means:

1) Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State

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## BACKGROUND:

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## ASSESSMENT OF NEED:

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#### Southwest Region:

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#### North Central Region:

Montana's North Central Region is known as the Golden Triangle area which predominantly grows wheat, barley and pulse crops (dry peas, garbanzo beans, chickpeas, lentils). Typically, producers hire for these seasons from mid-July to mid-September. In addition to crops, this region is also known for its cattle production with hiring typically taking place in February through late spring for calving season.

#### South Central Region:

In Montana's South Central Region, the predominant crops are wheat and barley much like the North Central Region. However, cattle operations as well as sheep operations are also predominant. The typical hiring season for calving and lambing lasts from February to late spring. Throughout the year, approximately 33 families are served within the region; however, the migrant workers hired in this region have different characteristics than those traveling through Montana with the cherry harvest in the Northwest Region.

#### Eastern Region:

Eastern Montana also produces wheat and pulse crops like other regions in Montana with similar harvest seasons. In addition, this region is known for its sugarbeet production. The harvest season for sugarbeets typically lasts from September to November.

The employment rates in agriculture are difficult to predict due to consistent unknown factors inherent to crop production and, at times, livestock production, therefore all hiring and peak seasons are estimated based on typical production year. Montana-based seasonal farm workers are typically employed for up to nine months of the year and often work in more than one type of production (both livestock and crops). Crop production in Montana is affected by a short growing season and it's not uncommon for planting to occur later than desired and harvest to take place earlier than desired due to snow fall. Most crops must be planted at certain times of the year, weeded, fertilized, harvested as they mature or ripen. Montana growers have employed a number of seasonal farm workers who sometimes will move from farm to farm, but most often workers will stay on with one employer for the entire season.

The official estimates of agriculture employment are derived from surveys of agricultural establishments that participate in the unemployment insurance system, and from the previous year's state income tax reporting for agricultural establishments. As a result, they are more likely to count

permanent agricultural workers than migrant and seasonal farm workers. Many Montana growers and producers express the lack of agriculture workers available in their area. This results in an increasing rate of using the foreign labor H-2A program.

3. An assessment of the unique needs of farmworkers means summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration

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#### BACKGROUND:

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#### ASSESSMENT OF NEED:

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#### Eastern Region:

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## 4. Outreach Activities

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

The state of Montana wrote the entirety of its outreach activities as a full narrative to best describe its outreach to MSFWs.

The state of Montana's DLI has designated staff conducting outreach across the state. MSFW outreach workers are trained in local office procedures, informal resolution of complaints and in the services, benefits, and protections afforded to MSFWs. Materials that are used in outreach activities include brochures for local health clinics, information on the complaint system, directions and brochures for local SNAP and TANF public assistance office, upcoming opportunities for occupational trainings, contact information for the local ag health and services offices, resources for child care, contacts for legal services, books for documenting their hours worked, information for contacting both state and federal Wage and Hour Division, and referrals for housing.

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Montana resident that does not travel significant distances for seasonal or temporary work, or is a year-round employee, and is English-speaking. However, there are a number of non-English-speaking agriculture workers whose primary language spoken is other than English, including Hmong and Spanish.

The American Job Centers throughout the state conduct a variety of MSFW outreach activities throughout the year. Outreach workers spend time in the service area contacting, explaining, and encouraging MSFWs to use the services and resources available in the area. The outreach workers find MSFWs throughout the state in areas where they live, work, and gather, such as markets, parks, and other locations. The responsibilities of the outreach workers include the following duties:

- Educating MSFWs on rights with respect to terms and condition of employment;
- Developing and maintaining links between MSFWs, American Job Centers, public and private community agencies, MSFW groups and employers;
- Coordinating outreach efforts with MSFW community service providers; assisting MSFWs with job search and placement, initiating job development contacts and referrals to supportive services;
- Assisting with the completion of the worker registration, resume, job applications, and other documents as needed;
- Providing assistance with obtaining unemployment insurance benefits, through the UI4U website, job search assistance, and referrals to specific employment opportunities if MSFWs are unemployed;
- Providing information about current and future employment opportunities which may be available, including posting job orders and informing MSFWs about available H-2A job orders;
- Informing MSFWs of the complaint system and providing assistance with filing and processing complaints;

MSFW Outreach workers receive training from the SMA as it becomes available and any collaborative training with other service providers for MSFWs including NFJP grantees. Staff members will be directed to complete online training modules on the Workforce GPS web site that are related to outreach and MSFWs. Additional training will be sent to all MSFW staff in the form of mini-trainings covering the following subjects:

- Ag Worker Health & Services
- Montana Legal Services Association
- Defining MSFWs
- MSFW Outreach
- MSFW Outreach Log
- Rural Economic Opportunities services to MSFWs
- Human Trafficking
- Sexual Harassment in the Workplace
- OSCC Complaint System
- Agricultural Employer Outreach

In addition, in October 2019, a day and a half MSFW and Foreign Labor Training conference was conducted where all designated outreach staff, and some of their supervisors were provided intensive training on MSFW outreach; H-2A Housing Inspections; Complaint Procedures; Human Trafficking

and Sexual Harassment among the MSFW population; Required posters for both H-2A housing and MSFW rights; and sharing of best practices among outreach workers.

This training also included presentations and networking with Montana's three primary MSFW partner agencies, Rural Employment Opportunities (REO), an NFJP grantee, Montana Legal Services Association and Ag Worker Health and Services.

The Montana Department of Labor & Industry has a working partnership and collaborates with the Montana Migrant Education and NFJP grantee, REO. REO has field staff located in offices throughout Montana, and serves individuals statewide. The agreements between the Montana Department of Labor & Industry and REO require coordinated services, including outreach activities. REO staff conduct regular outreach activities, according to their contract with the U.S. Department of Labor. The outreach conducted by REO staff results in individuals being referred to and co-enrolled in additional programs offered through Job Service offices or community-based organizations for further services. The REO staff also conduct outreach to employers on a regular basis, resulting in paid OJT and work experience opportunities for qualifying MSFWs. Outreach is approached from the standpoint of providing seasonal workers with the skills and education necessary to become employed full-time and to become economically self-sufficient. Through this partnership, Montana has been able to reach and serve members of the agricultural community who are otherwise not found or identified by workforce staff.

REO provides employment and training options and funding to MSFWs around the state and also to their qualifying dependents. The philosophy of serving entire families to create self-sufficiency is demonstrated by the Migrant Education Program, which is also administered through REO. That program provides education for children while parents and older family members work. In addition, the MEP program also provides language-specific services to schools across the state to help mitigate the impact on migrant children's education due to moving on a regular basis.

REO has partnerships with the Montana Food Bank, and provides food and gas assistance to MSFWs traveling in both Eastern and Western migrant streams. In addition, REO has the ability to provide limited emergency housing and works with agencies to find housing for MSFWs. Many MSFWs have limited English proficiency and REO provides translation services to assist MSFWs navigate barriers to additional assistance and services.

REO has developed specific outreach plans for each of its targeted regions to find the individuals who not only travel as migrant workers but who subscribe to the lifestyle of resident seasonal workers.

## **A. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices**

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### **BACKGROUND:**

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#### TARGETED OUTREACH:

After the state conducted a comprehensive training in October of 2019, partners identified challenges with outreach activities. The state of Montana is pursuing a strategy to increase partnerships and identify areas where outreach would better occur to ensure MSFWs across the state have meaningful engagement. For example, the state is looking at job fairs, county and state fairs, Pow-Wows, agriculture committees at local chamber of commerce, schools churches, community services, or other areas where MSFWs might be likely to congregate.

The state of Montana will continue to coordinate with REO and other statewide partners like Montana Legal Services Association and Ag Worker Health and Services to identify opportunities for targeted outreach.

#### ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE:

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In Montana's Southwest Region, the predominant crops are alfalfa hay, barley, and potatoes. The earliest activity involves planting potatoes in early March and harvesting in September and October. In addition, the Southwest region of Montana has extensive cattle-calf operations with the hiring season for calving beginning in February and lasting through late spring.

#### North Central Region:

Montana's North Central Region is known as the Golden Triangle area which predominantly grows wheat, barley and pulse crops (dry peas, garbanzo beans, chickpeas, lentils). Typically, producers hire for these seasons from mid-July to mid-September. In addition to crops, this region is also known for its cattle production with hiring typically taking place in February through late spring for calving season.

#### South Central Region:

In Montana's South Central Region, the predominant crops are wheat and barley much like the North Central Region. However, cattle operations as well as sheep operations are also predominant. The typical hiring season for calving and lambing lasts from February to late spring. Throughout the year, approximately 33 families are served within the region; however, the migrant workers hired in this region have different characteristics than those traveling through Montana with the cherry harvest in the Northwest Region.

#### Eastern Region:

Eastern Montana also produces wheat and pulse crops like other regions in Montana with similar harvest seasons. In addition, this region is known for its sugarbeet production. The harvest season for sugarbeets typically lasts from September to November.

The employment rates in agriculture are difficult to predict due to consistent unknown factors inherent to crop production and, at times, livestock production, therefore all hiring and peak seasons are estimated based on typical production year. Montana-based seasonal farm workers are typically employed for up to nine months of the year and often work in more than one type of production (both livestock and crops). Crop production in Montana is affected by a short growing season and it's not uncommon for planting to occur later than desired and harvest to take place earlier than desired due to snow fall. Most crops must be planted at certain times of the year, weeded, fertilized, harvested as they mature or ripen. Montana growers have employed a number of seasonal farm workers who sometimes will move from farm to farm, but most often workers will stay on with one employer for the entire season.

The official estimates of agriculture employment are derived from surveys of agricultural establishments that participate in the unemployment insurance system, and from the previous year's state income tax reporting for agricultural establishments. As a result, they are more likely to count permanent agricultural workers than migrant and seasonal farm workers. Many Montana growers and producers express the lack of agriculture workers available in their area. This results in an increasing rate of using the foreign labor H-2A program.

B. Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System (“Complaint System” described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

The state of Montana wrote the entirety of its outreach activities as a full narrative to best describe its outreach to MSFWs.

The state of Montana’s DLI has designated staff conducting outreach across the state. MSFW outreach workers are trained in local office procedures, informal resolution of complaints and in the services, benefits, and protections afforded to MSFWs. Materials that are used in outreach activities include brochures for local health clinics, information on the complaint system, directions and brochures for local SNAP and TANF public assistance office, upcoming opportunities for occupational trainings, contact information for the local ag health and services offices, resources for child care, contacts for legal services, books for documenting their hours worked, information for contacting both state and federal Wage and Hour Division, and referrals for housing.

The American Job Centers throughout the state conduct a variety of MSFW outreach activities throughout the year. Outreach workers spend time in the service area contacting, explaining, and encouraging MSFWs to use the services and resources available in the area. The outreach workers find MSFWs throughout the state in areas where they live, work, and gather, such as markets, parks, and other locations. The responsibilities of the outreach workers include the following duties:

- Educating MSFWs on rights with respect to terms and condition of employment;
- Developing and maintaining links between MSFWs, American Job Centers, public and private community agencies, MSFW groups and employers;
- Coordinating outreach efforts with MSFW community service providers; assisting MSFWs with job search and placement, initiating job development contacts and referrals to supportive services;
- Assisting with the completion of the worker registration, resume, job applications, and other documents as needed;
- Providing assistance with obtaining unemployment insurance benefits, through the UI4U website, job search assistance, and referrals to specific employment opportunities if MSFWs are unemployed;
- Providing information about current and future employment opportunities which may be available, including posting job orders and informing MSFWs about available H-2A job orders;
- Informing MSFWs of the complaint system and providing assistance with filing and processing complaints;

The Montana Department of Labor & Industry’s Workforce Service Division, which oversees the MSFW program, has a comprehensive complaint system referred to as the One-Stop Career Center Complaint System (OSCC), which takes complaints across programs from the field and then takes action to resolve the complaints across divisions within the agency.

MSFW Outreach workers receive training from the SMA as it becomes available and any collaborative training with other service providers for MSFWs including NFJP grantees. Staff members will be directed to complete online training modules on the Workforce GPS web site that are related to outreach and MSFWs. Additional training will be sent to all MSFW staff in the form of mini-trainings covering the following subjects:

- Ag Worker Health & Services
- Montana Legal Services Association
- Defining MSFWs
- MSFW Outreach
- MSFW Outreach Log
- Rural Economic Opportunities services to MSFWs
- Human Trafficking
- Sexual Harassment in the Workplace
- OSCC Complaint System
- Agricultural Employer Outreach

In addition, in October 2019, a day and a half MSFW and Foreign Labor Training conference was conducted where all designated outreach staff, and some of their supervisors were provided intensive training on MSFW outreach; H-2A Housing Inspections; Complaint Procedures; Human Trafficking and Sexual Harassment among the MSFW population; Required posters for both H-2A housing and MSFW rights; and sharing of best practices among outreach workers.

This training also included presentations and networking with Montana's three primary MSFW partner agencies, Rural Employment Opportunities (REO), an NFJP grantee, Montana Legal Services Association and Ag Worker Health and Services.

The Montana Department of Labor & Industry has a working partnership and collaborates with the Montana Migrant Education and NFJP grantee, REO. REO has field staff located in offices throughout Montana, and serves individuals statewide. The agreements between the Montana Department of Labor & Industry and REO require coordinated services, including outreach activities. REO staff conduct regular outreach activities, according to their contract with the U.S. Department of Labor. The outreach conducted by REO staff results in individuals being referred to and co-enrolled in additional programs offered through Job Service offices or community-based organizations for further services. The REO staff also conduct outreach to employers on a regular basis, resulting in paid OJT and work experience opportunities for qualifying MSFWs. Outreach is approached from the standpoint of providing seasonal workers with the skills and education necessary to become employed full-time and to become economically self-sufficient. Through this partnership, Montana has been able to reach and serve members of the agricultural community who are otherwise not found or identified by workforce staff.

REO provides employment and training options and funding to MSFWs around the state and also to their qualifying dependents. The philosophy of serving entire families to create self-sufficiency is demonstrated by the Migrant Education Program, which is also administered through REO. That program provides education for children while parents and older family members work. In addition, the MEP program also provides language-specific services to schools across the state to help mitigate the impact on migrant children's education due to moving on a regular basis.

REO has partnerships with the Montana Food Bank, and provides food and gas assistance to MSFWs traveling in both Eastern and Western migrant streams. In addition, REO has the ability to provide limited emergency housing and works with agencies to find housing for MSFWs. Many

MSFWs have limited English proficiency and REO provides translation services to assist MSFWs navigate barriers to additional assistance and services.

REO has developed specific outreach plans for each of its targeted regions to find the individuals who not only travel as migrant workers but who subscribe to the lifestyle of resident seasonal workers.

### C. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues

The state of Montana wrote the entirety of its outreach activities as a full narrative to best describe its outreach to MSFWs.

The state of Montana's DLI has designated staff conducting outreach across the state. MSFW outreach workers are trained in local office procedures, informal resolution of complaints and in the services, benefits, and protections afforded to MSFWs. Materials that are used in outreach activities include brochures for local health clinics, information on the complaint system, directions and brochures for local SNAP and TANF public assistance office, upcoming opportunities for occupational trainings, contact information for the local ag health and services offices, resources for child care, contacts for legal services, books for documenting their hours worked, information for contacting both state and federal Wage and Hour Division, and referrals for housing.

In addition, the Montana Department of Labor staff conducting outreach services are trained in and have a good understanding of the UI program and can assist MSFWs on filing a UI claim and basic eligibility requirements.

The American Job Centers throughout the state conduct a variety of MSFW outreach activities throughout the year. Outreach workers spend time in the service area contacting, explaining, and encouraging MSFWs to use the services and resources available in the area. The outreach workers find MSFWs throughout the state in areas where they live, work, and gather, such as markets, parks, and other locations. The responsibilities of the outreach workers include the following duties:

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- Assisting with the completion of the worker registration, resume, job applications, and other documents as needed;
- Providing assistance with obtaining unemployment insurance benefits, through the UI4U website, job search assistance, and referrals to specific employment opportunities if MSFWs are unemployed;
- Providing information about current and future employment opportunities which may be available, including posting job orders and informing MSFWs about available H-2A job orders;
- Informing MSFWs of the complaint system and providing assistance with filing and processing complaints;

MSFW Outreach workers receive training from the SMA as it becomes available and any collaborative training with other service providers for MSFWs including NFJP grantees. Staff members will be directed to complete online training modules on the Workforce GPS web site that are related to outreach and MSFWs. Additional training will be sent to all MSFW staff in the form of mini-trainings covering the following subjects:



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This training also included presentations and networking with Montana's three primary MSFW partner agencies, Rural Employment Opportunities (REO), an NFJP grantee, Montana Legal Services Association and Ag Worker Health and Services.

The Montana Department of Labor & Industry has a working partnership and collaborates with the Montana Migrant Education and NFJP grantee, REO. REO has field staff located in offices throughout Montana, and serves individuals statewide. The agreements between the Montana Department of Labor & Industry and REO require coordinated services, including outreach activities. REO staff conduct regular outreach activities, according to their contract with the U.S. Department of Labor. The outreach conducted by REO staff results in individuals being referred to and co-enrolled in additional programs offered through Job Service offices or community-based organizations for further services. The REO staff also conduct outreach to employers on a regular basis, resulting in paid OJT and work experience opportunities for qualifying MSFWs. Outreach is approached from the standpoint of providing seasonal workers with the skills and education necessary to become employed full-time and to become economically self-sufficient. Through this partnership, Montana has been able to reach and serve members of the agricultural community who are otherwise not found or identified by workforce staff.

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REO has developed specific outreach plans for each of its targeted regions to find the individuals who not only travel as migrant workers but who subscribe to the lifestyle of resident seasonal workers.

## D. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers

The state of Montana wrote the entirety of its outreach activities as a full narrative to best describe its outreach to MSFWs.

The state of Montana's DLI has designated staff conducting outreach across the state. MSFW outreach workers are trained in local office procedures, informal resolution of complaints and in the services, benefits, and protections afforded to MSFWs. Materials that are used in outreach activities include brochures for local health clinics, information on the complaint system, directions and brochures for local SNAP and TANF public assistance office, upcoming opportunities for occupational trainings, contact information for the local ag health and services offices, resources for child care, contacts for legal services, books for documenting their hours worked, information for contacting both state and federal Wage and Hour Division, and referrals for housing.

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REO has developed specific outreach plans for each of its targeted regions to find the individuals who not only travel as migrant workers but who subscribe to the lifestyle of resident seasonal workers.

## E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups

The state of Montana wrote the entirety of its outreach activities as a full narrative to best describe its outreach to MSFWs.

The state of Montana's DLI has designated staff conducting outreach across the state. MSFW outreach workers are trained in local office procedures, informal resolution of complaints and in the services, benefits, and protections afforded to MSFWs. Materials that are used in outreach activities

include brochures for local health clinics, information on the complaint system, directions and brochures for local SNAP and TANF public assistance office, upcoming opportunities for occupational trainings, contact information for the local ag health and services offices, resources for child care, contacts for legal services, books for documenting their hours worked, information for contacting both state and federal Wage and Hour Division, and referrals for housing.

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In addition, in October 2019, a day and a half MSFW and Foreign Labor Training conference was conducted where all designated outreach staff, and some of their supervisors were provided intensive

training on MSFW outreach; H-2A Housing Inspections; Complaint Procedures; Human Trafficking and Sexual Harassment among the MSFW population; Required posters for both H-2A housing and MSFW rights; and sharing of best practices among outreach workers.

This training also included presentations and networking with Montana's three primary MSFW partner agencies, Rural Employment Opportunities (REO), an NFJP grantee, Montana Legal Services Association and Ag Worker Health and Services.

The Montana Department of Labor & Industry has a working partnership and collaborates with the Montana Migrant Education and NFJP grantee, REO. REO has field staff located in offices throughout Montana, and serves individuals statewide. The agreements between the Montana Department of Labor & Industry and REO require coordinated services, including outreach activities. REO staff conduct regular outreach activities, according to their contract with the U.S. Department of Labor. The outreach conducted by REO staff results in individuals being referred to and co-enrolled in additional programs offered through Job Service offices or community-based organizations for further services. The REO staff also conduct outreach to employers on a regular basis, resulting in paid OJT and work experience opportunities for qualifying MSFWs. Outreach is approached from the standpoint of providing seasonal workers with the skills and education necessary to become employed full-time and to become economically self-sufficient. Through this partnership, Montana has been able to reach and serve members of the agricultural community who are otherwise not found or identified by workforce staff.

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REO has developed specific outreach plans for each of its targeted regions to find the individuals who not only travel as migrant workers but who subscribe to the lifestyle of resident seasonal workers.

## 5. Services provided to farmworkers and agricultural employers through the one-stop delivery system

Describe the State agency's proposed strategies for:

A. Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:

- i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers
- ii. How the State serves agricultural employers and how it intends to improve such services

Services Provided to MSFWs through the One-Stop System:

Montana is required to make WIOA services available to all job seekers, including MSFWs, in an equitable manner. Each American Job Center must offer the full range of employment services,

benefits and protections; this includes the full range of employment counseling, testing, job training, and referral services to MSFWs just as they are provided to non-MSFWs. Therefore, the services available through American Job Centers, including all other DOL-funded WIOA services, are available to MSFWs in a manner appropriate to their needs as job seekers.

The U.S. Department of Labor's Employment and Training Administration (ETA) requires that states ensure equity of services for MSFWs and non-MSFWs. Montana's Indicator of Compliance reports record all service outcomes tracked for regular job seekers, including MSFWs, such as receiving staff-assisted services, referrals to supportive services, referrals to jobs, career guidance, and job development contacts to ensure MSFWs continue to receive qualitatively equivalent and quantitatively proportionate services.

#### **Services Provided to Agricultural Employers through the One-Stop System:**

Montana's DLI recognizes the importance of the agricultural industry in Montana and has devoted resources to meet the labor needs of agricultural employers and MSFWs. Funding for agricultural services comes from Wagner-Peyser and Foreign Labor Certification funds granted to the state annually. Wagner-Peyser funds are given to Montana on a formula basis. The Foreign Labor Certification funds are provided by DOL/ETA to Montana to process foreign labor application requests, conduct housing inspections, conduct agricultural wage and prevailing practice surveys, and collect agricultural crop and labor information.

The American Job Centers provide customized services to employers on an individual and as needed basis. These services are in addition to the MWorks system, the online system available universally and at each Job Service office. MontanaWorks is used for registering job seekers for employment services, posting job openings online as well as in the offices, tracking services provided to job seekers and employers, and tracking referrals made to job openings. Outreach workers also provide the following service to agricultural employers:

- Perform recruitment activities to find and refer qualified MSFWs to fill the labor needs of agricultural employers;
- Encourage agricultural employers to publish their job openings using MontanaWorks to fill job openings;
- Provide labor market information with such data as supply and demand, salaries, training requirements, new and emerging occupations and industry growth; and
- Provide Rapid Response services due to planned closure or mass layoffs

Additionally, REO provides employers with reimbursement of up to 75% of a participant's wages during a contracted work experience or OJT.

### **B. Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups**

It is a policy of Montana Department of Labor & Industry to train local office staff on the procedures of the Employment Service Complaint System. All staff have been trained on how to accept a complaint from all citizens including farmworkers and to whom to send such complaints. Our partners have been informed and training has been shared on the ES Complaint process. This training will be shared on a yearly basis or as needed or requested.

The Montana Department of Labor & Industry has trained REO on the complaint process and will continue coordinating training annually.

### **C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.**

MSFW populations largely attain employment via personal relationships and prior seasonal employment, therefore the state of Montana continues to look for opportunity to use the ARS system as a tool to support and promote MSFW employment opportunities.

Agricultural employers are informed about Montana's Agricultural Recruitment System and what the process is for intrastate and interstate agricultural job orders. Montana will continue to explore additional opportunities to incorporate the use of the ARS with ag employers. In addition, all employers can post employment opportunities through Montana's job exchange, MontanaWorks.

## 6. Other Requirements

### A. Collaboration

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

As mentioned above the state of Montana has a formal MOU in place with REO to coordinate and collaborate on services provided to MSFWs. Each of the partner agencies attend statewide training to discuss services and opportunities to collaborate on outreach efforts and share promising practices from throughout the state. Statewide trainings are designed for partner engagement in an effort to strengthen relationships and better serve this population of workers.

Montana will continue to explore partnerships at the state and local level, including local ag committees at local chambers of commerce, education partners, and community service organizations.

Training is developed collaboratively across partners and included presentations and networking opportunities with Montana's three primary MSFW partner agencies, REO, Montana Legal Services Association, and Ag Worker Health and Services.

### B. Review and Public Comment

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

As outlined in federal regulations, the State Monitor Advocate is responsible to ensure that MSFWs receive equal employment services in both quality and quantity as compared to employment services provided to non-MSFWs. In the role as advocate, the Monitor Advocate promotes the needs and concerns of MSFWs to Workforce Services Division leadership. Additionally, the Monitor Advocate reviews and comments on directives and policy changes that affect the MSFWs. The Workforce Services Division has duly afforded the Monitor Advocate with the opportunity to comment on the Agricultural Outreach Plan as required by Title 20 CFR part 653.111(h). This Agricultural Outreach Plan was shared with the NFJP grantee, Rural Employment Opportunities (REO) for which they have had the opportunity to comment. In addition, this plan was also provided to the State Workforce Innovation Board and its interested persons list for public comment.

The AOP received comment from Montana Legal Services Association and REO. After receiving comment, the SWIB Director and the State Monitor Advocate scheduled meetings to incorporate all comment into the plan. The comments are below:

**REO:**

**The comment reconciliation meeting was conducted on January 15, 2020.**

**From:** Jami Anderson Lind <>

**Sent:** Tuesday, December 31, 2019 11:42 AM

**To:** Sands, Sandy <>

**Subject:** [EXTERNAL] Montana Agricultural Outreach Plan for review and comment

Sandy,

I don't know if it is worth mentioning the numbers of true migrant workers that come into the orchards at the cherry harvest (on page three under the NW Region heading) or if you want that much detail. I think it is significant in that it seems to be the only true large group of migrant workers and that they pick all the way up the west coast and then across to Montana. If you want numbers I can give you some.

Under several of the regional headings, it mentions calving going from February through mid March. Just because we have a cow operation, much of what I see is that many operations do not even start until mid March and end sometime in April or early May. I think it is a much broader time frame but you may be drawing on particular surveys.

There is only a small reference to the Migrant Education Program (MEP). I know that this is workforce oriented, but the services provided by MEP for the children lends itself to the holistic view of serving the migrant family. At the cherry harvest in particular, the MEP program keeps the children out of the fields so that parents and older family members can work. Across the state, the MEP program provides language specific services in schools to help mitigate the effect that moving on a regular basis has on the learning opportunities of the migrant children.

REO also has the ability on a very limited one time basis to help with emergency housing and to work with housing agencies to find housing. REO also provides translation services for individuals needing them for legal issues etc.

The plan states in paragraph one on page two that we have five field offices and we currently only have three in addition to the admin office in Helena.

One further thing that might be important is that REO has changed its intake process so that all seasonal farmworkers who apply for training under NFJP are automatically taken to (if possible) not just referred, the Job Service in their local area and registered for services and adult training funds.

Have a Happy New Year!

Thanks

Jami



**Montana Legal Services Association:**

**The comment reconciliation meeting was conducted on January 31, 2020.**

**From:** Erick Valencia <>

**Sent:** Wednesday, January 29, 2020 3:38 PM

**To:** Sands, Sandy <>

**Subject:** [EXTERNAL] Re: Montana Agricultural Outreach Plan for review and comment

Hi Sandy,

Here are my comments on the Ag Outreach Plan. I commented directly in the PDF where I thought it was most relevant. I've also included those same comments below. Let me know if you have any questions or concerns. As I mentioned over the phone, my schedule is pretty flexible this week and next.

Thanks!

Erick

1. Even though Montana agricultural workers are predominantly English-speaking Montana residents, there is also a significant population of agricultural workers with limited English proficiency whose needs should be addressed. There is also a large number of H-2A workers in Montana that present a unique set of challenges.

While MLSA does not have exact statistics, there is a significant number of non-English-speaking agricultural workers (MSFWs and non-MSFWs) in Montana. In MLSA's experience, the primary language spoken among agricultural workers, other than English, is Spanish. The yearly Cherry Harvest demonstrates the need to ensure language access to non-English speaking workers. In 2019, REO served food boxes to 201 unduplicated households during the Cherry Harvest. Some of these households were single people, but many households included spouses and other family members. MLSA staff regularly spoke to families of 3 or more workers. It is safe to say that the total number of harvest workers is much greater than 201, but MLSA does not know the exact number of individual workers served. REO and/or Ag Worker Health & Services may have better statistics regarding the number of workers served and the number of non-English-speaking workers. Every year during the Cherry Harvest, MLSA staff primarily speak Spanish with workers, and each agency ensures it has at least one Spanish-speaking staff member available during business hours.

There are pockets of limited English proficient non-H-2A MSFWs in certain communities. For example, there are fairly large populations of Spanish-speaking MSFWs in and around Dillon and Billings. Many of these workers return to their country of birth during the winter months when work is scarce, and return to their Montana communities in the Spring. Ag Worker Health & Services outreach staff may have better sense of those numbers.

Additionally, most Montana H-2A workers (and a large percentage of non-H-2A workers) who contact MLSA are from Mexico and Peru. Most workers from these countries have limited English proficiency.

According to USDOL disclosure data covering October 1, 2018 to September 30, 2019, USDOL certified 984 H-2A workers whose worksites were in Montana. H-2A workers present unique challenges in outreach such as limited English proficiency, isolation, dependency on the employer, inability to transfer to another employer if problems arise, loss of contact upon the worker's return to his or her home country, and exemption from the Migrant and Seasonal Agricultural Worker Protection Act that protects many non-H-2A MSFWs. H-2A sheepherder and range livestock workers present additional challenges. Of the 984 H-2A workers previously mentioned, 106 (nearly 11%) were sheepherders. As of January 29, 2020, there are 41 H-2A job orders posted on [seasonaljobs.dol.gov](https://seasonaljobs.dol.gov) [seasonaljobs.dol.gov]. Those job orders approve the hiring of 120 H-2A workers in Montana. Seventeen of those workers (or 14%), are sheepherders or range livestock workers. Sheepherders and range livestock workers present additional challenges that are not generally present among other H-2A workers. These challenges can include extreme isolation, a mobile worksite, a high level of dependency on the employer for food and water, lack of transportation, lack of cell phone service or

other meaningful means of communication, remaining on call 24/7, a monthly Adverse Effect Wage Rate rather than an hourly rate, and different standards from other H-2A workers that govern housing and working conditions. These factors necessitate a unique approach to shepherd and range worker outreach as well as different outreach materials.

2. Are outreach materials provided to H-2A workers? If so, how? Does MT DLI have outreach materials that inform H-2A workers of their unique rights and responsibilities? Are outreach materials provided in the workers' primary language? There is a significant population of H-2A workers, as noted above. Do Job Service offices conduct outreach activities specifically targeted towards H-2A workers? Do Job Service offices conduct targeted outreach to shepherders and range livestock workers?

3. Outreach at the Cherry Harvest is another significant coordinated effort that MT DLI engages in along with REO, MLSA, Ag Worker Health & Services, the Migrant Education Program, and cherry growers. Polson Job Service staff and REO have for years invited all these organizations and interested parties to a pre-harvest meeting to discuss harvest dates, the likely worker turnout, logistics, services, and an overall plan for the harvest season. DLI staff work closely with partner agencies and growers to ensure that services offered by the One-Stop System are offered to the cherry workers. A significant portion of the worker population during the harvest is Spanish-speaking only. The local job service staff work closely with Spanish-speaking staff from partner agencies to ensure that language does not pose a barrier to services.

4. Does MT DLI partner with State employees involved with the Migrant Education Program, or are all collaborative efforts with MEP directed toward REO?

## C. Data Assessment

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

Reviewing the previous four years of data reports on performance, the state of Montana has had challenges meeting all its goals to provide meaningful service to MSFWs. The state of Montana is a minimally funded state across WIOA programs; therefore, staff across the state have multiple roles, including administration of WIOA Title I programs and Wagner-Peyser programs, including the MSFW program. The lack of funding and size of the state create barriers and capacity issues with program administration. Therefore, the state of Montana is looking to increase partnerships and coordination with REO and additional community-based organizations to improve its performance and meet its goals.

Moving forward, the state of Montana expects to see improvement in conducting field checks of local offices as this task is a priority for the state monitor advocate. In addition, the state of Montana continues to work on enhancing its data collection through the data warehouse and system design across WIOA programs. This will improve Montana's reporting through the PIRL and give a better picture of the work happening across the state.

The state of Montana is focused on improved community-based outreach and continues to train across the state on the MSFW program and the importance of engagement with community-based partners to find and serve the MSFW population. In addition, the state of Montana continues to improve service delivery and increase community engagement and meeting individuals where they're at. With increased partnership, enhanced service delivery, and additional training the state should see an increase in the number of outreach contacts, which will help the state meet its minimal service indicators.

## D. Assessment of Progress

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

Activities conducted related to the Agricultural Outreach Plan and how these activities helped the State reach the goals and objectives described in the AOP consist of both outreach to partner agencies who work with MSFWs as well as Job Service's outreach directly to MSFWs. Each Job Service office offered the full range of employment services, benefits and protections, including the full range of employment counseling, testing, job training and referral services to MSFWs just as they provided to non-MSFWs. All services available from Job Service office, including all other DOL-funded WIOA services were available to MSFWs in a manner to their needs as job seekers.

Montana has a working partnership with Montana NFJP grantee, Rural Employment Opportunities (REO) as well as with Migrant Education. SMA actively collaborates in outreach efforts with these organizations. Outreach conducted by both REO and Job Service staff results in MSFWs receiving services through Job Service or community-based organizations. Employer outreach is conducted on a regular basis resulting in paid OJT and work experience opportunities for qualifying MSFWs. Through this partnership, Montana has been able to reach and serve more members of the agricultural community.

MSFW outreach workers are trained in local office procedures, informal resolution of complaints and in the services, benefits and protections afforded to MSFWs. Materials that are used in outreach activities include brochures for local health clinics, information on the complaint system, directions and brochures for local SNAP (Food Stamps) and TANF (cash assistance) public assistance office, upcoming opportunities for occupational trainings, contact information for the local migrant council, resources for child care, contacts for legal services, information for contacting both state and federal Wage and Hour Division, and referrals for housing if housing is needed.

Continued education and training on the definition of who an MSFW is as and how to accurately record contacts was conducted and will continue to be a focus on upcoming trainings throughout the year.

## E. State Monitor Advocate

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

Workload requirements are such that the State Monitor Advocate also serves as the State Workforce Advocate. This person oversees the agricultural operations of Job Service offices to ensure that MSFWs receive equal employment services in both quality and quantity as compared to employment services provided to non-MSFWs. Thus, the Monitor Advocate employee works as both a monitor and an advocate for the MSFWs. In the role as advocate, the Monitor Advocate promotes the needs and concerns of MSFWs to Workforce Services Division leadership. Additionally, the Monitor Advocate reviews and comments on directives and policy changes that affect the MSFWs. The Workforce Services Division has duly afforded the Monitor Advocate with the opportunity to comment on the Agricultural Outreach Plan as required by Title 20 CFR part 653.111(h).

## Wagner-Peyser Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes

The State Plan must include	Include
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: <ol style="list-style-type: none"> <li>1) Initiate the discontinuation of services;</li> <li>2) Make the determination that services need to be discontinued;</li> <li>3) Make the determination to reinstate services after the services have been discontinued;</li> <li>4) Approve corrective action plans;</li> <li>5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days;</li> <li>6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and</li> <li>7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.</li> </ol>	Yes

## Wagner Peyser Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	67.0%	67.0%	67.0%	67.0%
Employment (Fourth Quarter After Exit)	63.0%	65.0%	63.0%	65.0%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$5,134	\$5,600	\$5,134	\$5,600
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## Program-specific Requirements for Adult Education and Family Literacy Act Programs

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

### a. Aligning of Content Standards

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The Montana Board of Public Education, upon recommendation from the Superintendent of Public Instruction, adopted the Montana Content Standards for English Language Arts/Literacy and Mathematics, on November 4, 2011. These standards, along with Science standards adopted in 2016, ensure that when secondary students have the knowledge and skills they need to succeed in the 21<sup>st</sup> century economy. Skills include problem-solving, critical thinking, communication, team work, research, and the use of technology.

In February 2015, the Adult Education (AE) Unit at the Office of Public Instruction (OPI) adopted the College and Career Readiness (CCR) Standards for Adult Education. These standards identify the essential CCR components required to be incorporated into the adult education classroom. By adopting these standards, Montana’s AE programs will have student expectations that are consistent with K-12 students. Additionally, AE programs will have access to K-12 tools and materials that support student learning.

The adoption of the CCR Standards will drive adult education professional development, acquisition of textbook and technology-based resources, and selection of formative and summative assessments. Aligning adult education standards with the Montana Content Standards provides all adult students with the same academic opportunity to be prepared for employment or postsecondary training without remediation. Eligible providers will work with the state to identify curricular framework for the standards that take into account academic requirements for non-credit bearing courses in postsecondary and occupational standards. The eligible provider will ensure that all teachers have implemented, or will implement standards-based education, and agree to participate in ongoing professional development that supports standards-based education.

### b. Local Activities

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

## Adult Education and Literacy Activities (Section 203 of WIOA)

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
  1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
  2. Is for the purpose of educational and career advancement.

**Special Rule.** Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

The state of Montana requires eligible providers to operate a program that includes:

- Adult education;
- Literacy;
- Work place adult education and literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Work force preparation activities; or
- Integrated education and training.

In 2015, all adult education providers successfully completed a Local System Logic Model that demonstrates how they can integrate all the adult education and literacy activities listed above to effectively provide comprehensive adult education services required for transitioning adults to postsecondary education, occupational training or employment. This model continues to evolve and is the driving force for adult education services. This confirms that programs can deliver a variety of

services to meet individual student needs. The foundation of every providers' Local System Model is the identification of partners they need to collaborate with to provide the variety of adult education and literacy activities.

All eligible adult education and literacy providers assess the need to provide an English Language Acquisition and Civics Education Program in their area and provide services when there is a demonstrated need. The state will not fund family literacy activities, as limited resources have inhibited the state's ability to provide those activities in Montana.

The Montana AE uses the 13 considerations listed under "Required Local Activities" to fund each eligible provider establishing and operating programs that provide AE and literacy activities. The Request for Proposals (RFP) will include the considerations and ask for respondents to summarize how they meet the described elements. Reviewers were given a rubric and scoring guide that included these considerations. Funding is determined using a performance-based formula.

The state funds local providers that serve adults 16 years and older, not enrolled in secondary school. Services include:

- Adult Education and Literacy Services;
- Workplace Preparation tied to Career Pathways;
- English Language Acquisition;
- Integrated Education and Training.

Local providers are selected using the following criteria:

1. Scope: Programs must be able to provide data demonstrating they have met previously proposed state targets for the required percent of students making a measurable skill gain. For programs not previously funded, data demonstrating student learning gain, especially for individuals with low-levels of literacy, will need to be provided. Programs will also need to make available data that demonstrate they have provided students the knowledge and skills needed for successful transition to postsecondary education or employment. Both measurable skill gain data and transition data must be disaggregated to demonstrate a history of success with students who have low levels of literacy, disabilities (including learning disabilities), or are English language learners.

Eligible providers will need to articulate how their instructional delivery model aligns to the needs of one-stop, postsecondary, and employer partners. This alignment at a minimum must include the ability to offer flexible scheduling so that adult education services coordinate with the students' wrap-around support services and logistic needs. The delivery model must be of sufficient intensity and duration so that the students' will exit with the necessary skills to attain their career goal. Existing providers will base intensity and duration of service on demonstrated past effectiveness (student skill gain and transition outcomes) and the latest research on the effectiveness of time and intensity.

It will be critical for each program to validate their commitment to an instructional delivery model that can support high school equivalency attainment, as well as preparation for entrance into postsecondary, a training program, or employment for adults with, or without, a high school diploma. This support must lead to preparation for a career pathway for all students, including the low-skilled and under employed, in need of increasing their knowledge and skills for the next career step. All eligible providers will assess the need for providing an English Language Acquisition and Civics Education Program in their area and provide services when there is a demonstrated need.

2. Content: Eligible providers will verify that adult education activities are conducted by licensed teachers, counselors, administrators, or individuals with relevant adult education experience and confirm that all staff will participate in high quality professional development offered by the state AE unit. Professional development activities will include face-to-face and electronic means, so all staff will be able to participate in a variety of delivery venues.



Providers will ensure that curriculum supports high school equivalency attainment, measurable skill gains, and career pathways. Instruction in all content areas, including reading, writing, speaking, mathematics, and English Language Acquisition are delivered by staff who are knowledgeable of the essential components of reading instruction. Providers must use scientific, research-based instructional delivery models for students in all content areas. Providers will articulate how distance learning, and other modes of technology, is integrated into instruction to support digital literacy attainment and meet students' specific learning needs.

The goal of instruction for all students will be a successful transition to employment, postsecondary, or training according to their chosen career pathway. This will require contextualized instruction, and student pathways guided by labor market needs and data from collaborative partnerships including:

- Education Partners;
- One-Stop Partners;
- Community-Based Organizations;
- Employers.

The array of program activities that support individual student career pathways must be based on each student's career portfolio. Eligible providers will describe how they will assist all students in setting up their career pathway portfolio through a series of lessons in the Montana Career Information System (MCIS). Providers will detail how teachers will assist students in aligning their skills and interests with a career choice and help them create long and short-term goals to enter their career pathway. Each program will share their protocol for linking student career pathways to academic lessons that are relevant and supportive of the student's career goal. Providers will confirm that they are developing curriculum and providing contextual learning activities, so students acquire the 21st century knowledge and skills needed for transition to their individual career pathway. Providers will apprise the state of key partners involved in the development of the contextualized curriculum. Eligible providers will also articulate how they will share student career portfolios with other agencies and support services.

Providers will ensure that the teaching staff offer a variety of instructional strategies that engage students and promote student persistence and retention; this should include whole group instruction, peer tutoring, individualized instruction, distance learning, hybrid models, and co-teaching formats. The variety of instructional strategies will integrate academics, career counseling, and soft skills to bolster the students' ability to gain employment, transition to college, or enter a training program that could include an apprenticeship.

3. Organization: Providers must document evidence that they have the capacity to support the high-quality data information system necessary to report participant outcomes and monitor program performance. The system must collect all data elements required for the WIOA Annual Statewide Performance Report. Primary indicators of performance that will be reported include:

- Participants in unsubsidized employment during the second quarter after exit;
- Participants in unsubsidized employment during the fourth quarter after exit;
- Median earnings from unsubsidized employment the second quarter after exit;
- Percentage of students who obtain a postsecondary credential or a high school equivalency diploma;
- Percentage of students who participate in an education or training program; and
- Percent achieving a measurable skill gain.

Providers must provide evidence of activities with other education institutions, local workforce partners, and agencies that support student career pathways. MCIS is the common career planner used in the AE program. The common career planning tool will be a resource in every AE program.

Beyond student attainment of a measurable skill gain, achieving a high school equivalency or postsecondary credential, or entering a career pathway, eligible providers must demonstrate that they have established cross-agency partnerships to help students navigate system challenges that can be barriers to success, like completing applications, writing resumes, scheduling campus visits, etc. Providers must be willing to cooperate with agency partners to provide wrap-around services common clients need.

Through ongoing labor market analysis all providers will have an awareness of regional labor market needs to provide teachers with a working knowledge of regional career opportunities. Using current information provided by Montana Department of Labor at [lmi.mt.gov](http://lmi.mt.gov), providers will ensure relevancy in transfer of learning toward student career pathway goals. Providers must be able to disclose their methodology for ensuring that employer and labor market needs are helping drive their instructional practice.

Allocations for providers are awarded by a funding formula that recognizes the components of an effective AE program based on the WIOA Statewide Performance Report. Effective programs will be those that deliver instructional activities that support student transition to specific occupations or career clusters. Grant award preference is given to providers that demonstrate that instructional services are delivered cost effectively to a reasonable number of students, and that they can make themselves readily available to core partners for wrap around services. Consortium applications are encouraged to assist providers in meeting the cost benefit expectations and core partner collaboration.

## c. Corrections Education and other Education of Institutionalized Individuals

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional

institution must give priority to individuals who are likely to leave the correctional institution within five years of participation in the program.

Montana's Office of Public Instruction will use no more than 20% of funds awarded to eligible providers to support programs under section 225 for incarcerated and institutionalized individuals. Corrections 225 funds are targeted for adult education and literacy activities and career pathways. Grant funds are awarded to any eligible provider that offers services to incarcerated or institutionalized individuals. Funds are awarded using the same competitive application process outlined in the Common Elements-Multi-Year Grants or Contracts section; after which providers may request funds on an annual basis through an extension application.

The state will award allocations to correctional institutions including:

- Prisons;
- Jails;
- Reformatories;
- Work farms;
- Detention centers;
- Halfway houses;
- Community-based rehabilitation centers; or
- Any other similar institution designed for the confinement or rehabilitation of criminal offenders.

Providers will demonstrate their ability to provide adult education that includes career pathway curriculum, integrated education and training (if available), peer tutoring, and transition initiatives that may lead to reduced recidivism. Providers will confirm their ability to support individual participant's career plans through curriculum and activities that assist in not only achieving an academic measurable gain, but transition to employment or postsecondary or training after exit.

Eligible providers must provide documentation on their capacity to support high school equivalency attainment and career pathways. Eligible providers will report on the WIOA primary performance indicators the same as all other AE providers. Additionally, providers must report their progress in carrying out their identified program activities to support career pathways, as well as provide data on the rate of recidivism for offenders served.

## d. Integrated English Literacy and Civics Education Program

Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities.

Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

The state's application for 243 funds requires applicants to describe how they will provide English language acquisition and civics education in combination with integrated education and training activities. Eligible providers funded with 243 funds must design programs to prepare English language learners for placement in unsubsidized employment leading to economic self-sufficiency and integrate with local workforce development to carry out the activities of the program.

Montana AE programs providing Integrated English Literacy and Civics Education will be prepare adults who are English Language Learners in multiple ways and through various strategies for transition to employment within in-demand industries and occupations that lead to economic self-sufficiency. Programs will be designed to assist these learners with improving their English language as guided by instructors who use multiple resources in class, online, and through collaborative projects. Contextualized instruction in the context of civics education will be key for transfer of learning in the rights and responsibilities of citizenship, naturalization procedures, civic participation, and U.S. history and government to help students acquire the skills and knowledge to become active and informed parents, workers, and community members. Collaborating with Department of Labor and Industry and other local business entities to align workforce preparation activities and building integrated education and training (IET) opportunities for a variety of in-demand career fields will be another central component of each program. Using the Montana Career Information System (MCIS), expanding on current IET models already in place, engaging in work-based learning opportunities, assisting with on-the-job-trainings, providing customized trainings for businesses, and continuing best practice with collaborative mindsets and efforts will provide the necessary transitional supports and successful outcomes for each learner.

The IELCE funds for sections 231 and/or 243 are awarded to eligible providers through a competitive application process outlined the Common Elements-Multi-Year Grants or Contracts; after which providers may request funds on an annual basis through an extension application.

## e. State Leadership

### 1. Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA

State leadership funds support the alignment of AE activities with those of other core partners to promote career pathways that provide students access to employment and training services. The state will ensure eligible providers' integration of pathway instruction through a variety of funded activities. First, the state will collaborate with core partners to provide regional and statewide conferences and trainings. The State AE Unit has already supported a 2015 WIOA Summer Kickoff that brought over 300 staff members from all the core partner agencies together to begin the discussion on how we can coordinate services to support a client's development of a career pathway and expedite his/her transition to employment or training services. AE representatives continue to be involved in WIOA planning on both state and local levels.

Braiding funds with other core partners for conferences and trainings focused on supporting career pathways is how leadership funds are used to align with the work of core partners. Collaboration across core partner agencies will evolve to meet the needs of WIOA implementation and sustainability. Second, the state will support eligible providers' ability to integrate and sustain career pathways in their instructional practice. Funds will be available to support regional meetings with workforce and one-stop partners to help AE programs identify the components of job-driven training that need to be incorporated into their curriculum. Regional professional development will make use of leadership dollars to assist programs in learning how to become responsive to local labor market demands. Third, the state will use funds to develop templates and identify resources that support a

systemic approach to career pathways; technical assistance will be made available for providers on the use of state developed resources that will inform their pathway implementation.

State leadership funds will establish high quality professional development to improve instruction in the essential components of reading instruction and research-based approaches related to the specific needs of adult learners. Leadership activities with essential components of reading focus will be used to create the foundation for adults to develop the skills needed to obtain high school equivalency, transition to postsecondary education, or enter the workforce. The state will contract with field and subject experts as needed. Teachers are required to participate in a variety of professional development that blends face-to-face and technology.

The state will also contract for services with individuals to bring research-based activities that support adult learners in other content areas and workforce learning activities. Program data will inform the state on promising instructional practices and effective instructional strategies. The state will use this information to disseminate information about models and promising practices related to the needs of adult learners. In programs where students readily make gains in reading, the state will support staff in the development of teacher lessons, resource links, and fund preparation for trainings to assist colleagues in successful reading instruction. The state will carefully monitor student data to see patterns on student transition to postsecondary, employment, and credential attainment. Programs that have data reflecting successful student exit trends are provided funds to prepare workshops and regional trainings to share instructional strategies and activities that positively impact student outcomes.

The state recognizes the importance of students' acquiring 21st century work-place skills, so the state will provide technical assistance to eligible providers on an as needed basis. Technical assistance is available for instructional improvement in reading, writing, mathematics, English language acquisition, speaking, as well as distance learning. Technical assistance is offered in two ways: training with staff from other eligible providers who have demonstrated effectiveness or independent contractors. In either case, the individual contractor is selected based on their ability to provide rigorous, research-based content that will promote program improvement.

Working with one-stop partners to provide student access to education and training services is a priority. Technical assistance is available for programs in the use of technology, including digital technology and technology for system efficiencies.

The state requires each program to conduct monthly audits to evaluate students' pre-test gains, retention, pathway activities, and student exit outcomes. The state will use the monthly audits to evaluate program effectiveness. As documented evidence indicates a programs' ability to meet the learner needs, the state will conduct further investigation to determine what unique factors are contributing to the programs' continued success. If there emerges a model that can be replicated by other programs the state will use leadership funds to disseminate information about the specific model that appears to be a promising practice.

The state will also conduct periodically scheduled onsite monitoring to gather additional information about the eligible providers' successes in equipping students with skills needed for seamlessly transitioning from AE to employment, postsecondary, or training. A monitoring evaluation tool will be used to guide the onsite monitoring; an onsite monitor will review student files, data entry protocol, and overall adherence to WIOA requirements. The onsite monitor will also conduct student and staff interviews using a template designed to capture the providers' alignment with core partners and implementation of career pathways. The desk audit coupled with results from the onsite monitoring will be used to evaluate the quality and improvement of adult education and literacy activities across the programs. They will also be a source for the state to glean and disseminate information about models and promising practices. The state will use leadership funds to disseminate information about programs who are implementing innovative practices that were not readily captured in the monthly desk audit.

Desk audits and onsite monitoring results will also be used to identify priorities for funding permissible activities. Combined these two activities will provide the state information on the eligible provider's

implementation of the state-adopted content standards, teacher quality, and the systemic approach to student transition. These will be the high priorities for permissible funds if program analysis indicates providers are facing challenges.

In summary, the desk audits and onsite visits described above will be the primary methods to monitor and evaluate the quality of adult education and literacy activities. Additionally, the state has always engaged in ongoing data monitoring which provides the opportunity for immediate technical assistance to promote local program success. In the event that the desk audit, on site evaluation, or ongoing data conversations are not sufficient support for program success, the state will require a low-performing provider to complete a corrective action plan. The plan will include a description of required activities to improve performance, strategies to meet each activity, evidence of completion, projected date for completion, and assigned staff for each activity. The state will schedule regular conference calls and site visits to assist in local provider in their program improvement plan. All AE staff will be required to participate in a minimum number of hours of professional development annually that is provided by the AE Unit at the Montana Office of Public Instruction. The state will provide continuing education units for teachers that will be tracked in the state student information system.

## 2. Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable

The state will work in collaboration with core partners to develop strategies for student retention and to provide assistance to eligible providers in developing and implementing the objectives of Title II of WIOA. Learner education gains and enhancement of employability skills will increase the success of clients across all core programs. This collaboration may require use of permissible funds.

### f. Assessing Quality

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

The state assesses the quality of providers through data analysis. The state reviews data to track providers' success in meeting state targets in the following areas:

- Academic learning gains;
- Entry into employment in required quarters;
- Obtaining a secondary credential; and
- Enrollment into postsecondary or training.

Monthly desk audits provide the state with information on which providers are not meeting targets and need of technical assistance beyond the state leadership activities that are provided. Technical assistance is targeted to the area of need and is individualized and focused.

At the end of a program year, providers not meeting targets are required to participate in state-determined technical assistance or a program improvement plan. If a program does not adhere to technical assistance or improvement plan components, they may be in jeopardy of not receiving AEFLA funds. When funds are not awarded to an existing provider, the state will run an RFP for a new eligible provider in the area, if there is no other AE provider in the region.

Programs increasing student academic gains and outcomes cannot decrease in subsequent program years. Targets must be met or exceeded each year.

Allocations to eligible providers are awarded according to the state performance-based funding formula. Points are awarded for performance outcomes; programs not meeting outcomes will receive reductions in their allocation.

The quality of professional development is assessed with scrutiny similar to assessing the quality of local providers. The state uses a combination of program data and a statewide survey to determine professional development needs. Professional development providers and activities are selected to meet the identified state needs, and they are selected according to their past effectiveness. Special attention is given when determining who and how we will select a professional development strategy based on research-based methods. This is a priority for the state. At the conclusion of each professional development activity, all participants complete an evaluation, which is aggregated at the state level to assess the impact of the activity and what follow-up activities are needed to support program improvement. Additionally, participants are required to analyze student performance data prior to professional development, at the conclusion of the activity, and continue to evaluate the data overtime, until it is determined the professional development has become job-embedded and is making the anticipated positive impact on student outcomes. The programs self-analysis and student data will also be a source for the state to glean and disseminate information about models and promising practices. The state will use leadership funds to disseminate information about programs who have effectively implemented innovative practices based on professional development activities.

## Adult Education and Family Literacy Act Program Certifications

States must provide written and signed certifications that:

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

## Adult Education and Family Literacy Act Program Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes

The State Plan must include	Include
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

## Authorizing or Certifying Representative

### CERTIFICATION REGARDING LOBBYING

#### Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of

Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL,



"Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Please download and sign the forms below. Please scan and return the forms to [wioa@ed.gov](mailto:wioa@ed.gov) at the same time you submit your State Plan via the portal.

1. SF424B - Assurances – Non-Construction Programs  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
2. Grants.gov - Certification Regarding Lobbying  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)

<b>APPLICANT'S ORGANIZATION</b>	<b>Enter information in this column</b>
Applicant's Organization	Montana Office of Public Instruction
<b>PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE</b>	<b>Enter information in this column</b>
First Name	Katie
Last Name	Madsen
Title	Adult Education Unit Manager
Email	Katie.Madsen@mt.gov

## Section 427 of the General Education Provisions Act (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions posted at <https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc>.

In accordance with Section 427 of the Department of Education's General Provision Act (GEPA), the OPI ensures equal access and participation in the SRCL project to all persons regardless of their gender, race, national origin, color, disability, or age. The Office of Public Instruction identifies and implements strategies to ensure that all of its population has equitable access to, and participation in, its federally assisted programs for students, teachers, and other program beneficiaries with special needs. The largest minority population in Montana is the Native American population. Efforts to ensure coordination and collaboration with agencies from Native American communities are reflected in all OPI activities. These proactive steps will ensure that project services are available to eligible students, families, and providers in communities throughout the state.

Documents are translated, using translators and interpreters; and other formats (e.g., large print, Braille, text to speech software) at the state or local level, as needed.

Meet individual child needs that result from a disability to enable the child to be involved in and make progress in the general education curriculum at the local level, as needed.

Standard testing accommodations will be made for identified students with disabilities at the local level, as needed.

The OPI Implementation Team will ensure schools are using and have access to curriculum resources that are accessible and nonbiased to students, teachers, and other program beneficiaries with special needs.

Community and family involvement will reflect equitable access to all populations of the state of Montana and will not be limited by gender, race, national origin, color, disability, or age at the state or local level.

All professional development will be located in accessible facilities and necessary adaptive accommodations will be made to make the content of workshop accessible to all participants (e.g., large print, Braille, speech to text software, adaptive technology) at the state or local level.

The OPI Adult Education Unit will ensure local WIOA Adult Education Programs are adhering to the proactive steps listed above via program visits, monitoring, and grant competition applications.

## Adult Education and Literacy Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	50.0%	50.0%	51.0%	51.0%
Employment (Fourth Quarter After Exit)	30.0%	30.0%	31.0%	31.0%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$3,300	\$3,300	\$3,400	\$3,400
Credential Attainment Rate	22.0%	22.0%	23.0%	23.0%
Measurable Skill Gains	54.0%	54.0%	55.0%	55.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

## Program-Specific Requirements for Vocational Rehabilitation (Combined or General)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

[13] Sec. 102(b)(2)(D)(iii) of WIOA

### a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

#### INTERNAL CONTINUOUS IMPROVEMENT

- VRBS needs to review current rules and make revisions that reflect WIOA values of:
  - Preparing youth with disabilities for meaningful careers,
  - Competitive/integrated employment for all persons with disabilities, and
  - Services to employers
- VRBS needs to engage staff in WIOA changes to enhance outreach to business partners.
- VRBS should enhance the staff's ability to assist all consumers in achieving competitive/integrated employment.

- VRBS needs to continue to handle the financial situation in order to proactively recruit qualified staff, to make corrective actions from RSA monitoring, and to continue to move off the Order of Selection.

#### **PROVIDE 21<sup>st</sup> CENTURY QUALITY SERVICE**

- VRBS should coordinate with service providers, such as benefits planners, to make sure consumers can financially benefit from employment.
- VRBS, along with WIOA partners, should continue and improve outreach efforts to businesses.
- VRBS must continue to collect data and refine the approach to Pre-Employment Transition Services, Competitive/Integrated Employment and Employer Services mandated under the WIOA.

#### **NETWORK WITH OTHER AGENCIES & EMPLOYERS**

- With Order of Selection in place, VRBS should work to build strong relationships with other community partners to facilitate access to a broader array of services for Montanans with disabilities.
- VRBS should continue to partner with middle school, high school, and post-secondary levels of education.
- VRBS should continue its multiple contracts with high schools around the state to build on Pre-Employment Transition Services.

## **2. The designated State unit's response to the Council's input and recommendations; and**

**SRC Recommendation:** VRBS needs to review current rules and make revisions that reflect WIOA values of: Preparing youth with disabilities for meaningful careers; Competitive Integrated employment for all persons with disabilities; and Services to employers

**VRBS Response:** VRBS has gained considerable expertise since the implementation of WIOA and developed service delivery strategies, in partnership with federal partners and technical assistance centers, to address WIOA mandates regarding the areas mentioned. VRBS is continually reviewing strategies and evolving procedures to improve and strengthen services to youth and businesses as well as increase competitive integrated employment outcomes. Additionally, VRBS continues to work on making administrative rule changes in this regard. The Council will be kept informed as the rule changes proceed.

**SRC Recommendation:** VRBS needs to engage staff in WIOA changes to enhance outreach to business partners.

**VRBS Response:** VRBS has a designated staff person, the business services specialist, who leads a business services team comprised of VRBS staff members across the state. These business services team members make direct contact with businesses in their respective areas of the state; attend and participate in local Chamber of Commerce functions, Society of Human Resource Managers, Job Service Employer Councils (JSEC), Economic Development meetings, and other area specific groups; and provide Windmills trainings to businesses and workforce partners to build awareness of disability-related attitudinal barriers among a myriad of other region specific activities. Business services team members are encouraged to share relevant information obtained through their activities

with all VRBS staff members. VRBS will continue to work on developing, improving, and expanding these efforts and keep the Council informed of significant developments.

**SRC Recommendation:** VRBS should enhance the staff's ability to assist all consumers in achieving competitive/integrated employment.

**VRBS Response:** WIOA tasks VRBS with promoting and protecting competitive integrated work for people with disabilities. Procedure outlining the background, specific requirements for, and correct implementation of competitive integrated employment has been written and disseminated to all VRBS staff. It is implied that any consumer completing the application process for VRBS services is interested in a competitive integrated employment outcome and when staff work on career planning and job placement with those consumers, the updated competitive integrated employment procedure is utilized. VRBS has provided detailed guidance to staff that a variety of past placements did not meet the definition of competitive integrated employment and thus those past placements are no longer accepted as successful program exits. Additionally, VRBS regularly provides career counselling and information and referral services to individuals in segregated settings across the state to provide informed choice related to competitive integrated employment.

**SRC Recommendation:** VRBS needs to continue to handle the financial situation in order to proactively recruit qualified staff, to make corrective actions from RSA monitoring, and to continue to move off the Order of Selection.

**VRBS Response:** VRBS takes the budget, staffing, and Order of Selection (OOS) very seriously. The VRBS Central Office is fully staffed for the first time in three years and hiring in areas identified as having the highest need across the state continues to be ongoing.

VRBS has not yet been provided with the final findings from the Rehabilitation Services Administration (RSA) monitoring, but has taken a proactive approach to improving areas where corrective actions are expected. VRBS is committed to utilizing the outcomes of the recent RSA monitoring to evolve and refine its policies, procedures, operations, and service delivery and will keep the Council abreast of the final RSA feedback as well as steps taken to meet RSA's recommendations.

Since entering into Order of Selection, VRBS has implemented various strategies to resolve issues with overspending and come out of Order of Selection. Some strategies include improved monitoring of counselor purchases, establishment of written internal controls to prevent and identify incorrect spending, and utilization of budget carryforward practices to continue providing quality and comprehensive services to those currently participating in the VRBS program as well as those newly entering into services.

The Council will continue to be updated on the budget, staff vacancies, and movement on the OOS waiting list as progress is being made.

**SRC Recommendation:** VRBS should coordinate with service providers, such as benefits planners, to make sure consumers can financially benefit from employment.

**VRBS Response:** WIOA's emphasis on competitive integrated employment is a large factor in increasing consumers benefiting financially from employment. Specifically, minimum wage is no longer considered to be an appropriate wage for any consumer that is working, but rather a consumer working in a competitive integrated position is expected to be making a wage comparable to others in similar positions. Regarding benefits counseling, VRBS staff have been instructed to refer consumers to qualified benefits counselors in their respective areas across the state as well as to encourage consumers who receive Social Security benefits to actively participate in benefits counseling. Recently, 4 VRBS staff at various locations across the state have begun training to become certified benefits planners in order to provide in-house benefits with the intention of increasing and improving access to benefits planning services for consumers. VRBS will continue to provide updates regarding in-house benefits counseling to the Council.

**SRC Recommendation:** VRBS, along with WIOA partners, should continue and improve outreach efforts to businesses.

**VRBS Response:** Again, VRBS has established an active business services team comprised of VRBS staff across the state that regularly engage with businesses, participate in workforce-focused community meetings, and provide Windmills trainings. Additionally, a standalone VRBS business services website has been created as well as printed business services materials in effort to improve access to information for the dual customer. The business services specialist, business services team members, and VRBS leadership in collaboration with workforce partners continue to gain expertise in the area of providing services to businesses as well as evolve service delivery methods to best meet the needs of the businesses in Montana. VRBS will keep the Council informed of the activities being conducted regarding business services.

**SRC Recommendation:** VRBS must continue to collect data and refine the approach to Pre-Employment Transition Services, Competitive/Integrated Employment and Employer Services mandated under the WIOA.

**VRBS Response:** Again, VRBS has gained considerable expertise since the implementation of WIOA in the areas of Pre-Employment Transitions Services (Pre-ETS), competitive integrated employment and business services. VRBS has continued and will continue to evolve service delivery strategies regarding the areas mentioned, in partnership with federal partners and technical assistance centers, to address WIOA mandates. For example, VRBS recently established its own bureau for Pre-ETS. A bureau chief has been hired who is currently in the process of hiring the first 3 staff of Pre-ETS Specialists, Pre-ETS focused vocational rehabilitation counselors, who will coordinate with schools and other interested parties to ensure that students with disabilities receive Pre-ETS to prepare them for life after high school.

**SRC Recommendation:** With Order of Selection in place, VRBS should work to build strong relationships with other community partners to facilitate access to a broader array of services for Montanans with disabilities.

**VRBS Response:** Consumers determined to be in a closed category during order of selection are given a list of alternative resources for services specific to the region they live in.

Also, WIOA mandates partnership with many other agencies involved with the workforce service system. The relationships built through this stronger partnership are expected to provide new opportunities for consumers in closed categories during order of selection.

In addition, VRBS has been working with other agencies to understand that many consumers are on a waiting list for VR services and agencies need to understand this and do the best they can to help consumers until their VR services can become active.

**SRC Recommendation:** VRBS should continue to partner with middle school, high school, and post-secondary levels of education.

**VRBS Response:** VRBS has completed multiple contracts with high schools around the state to establish Pre-employment Transition services. VRBS emphatically believes that the partnership with high schools is significant and necessary in assisting young people with disabilities to prepare for their careers.

VRBS also partners with other levels of education. VRBS has worked with several of the colleges and universities in the state to develop programs that assist youth with disabilities in a variety of ways. VRBS will keep the Council informed of the activities being conducted with all levels of education.

**SRC Recommendation:** VRBS should continue its multiple contracts with high schools around the state to build on Pre-Employment Transition Services.

**VRBS Response:** Since the implementation of WIOA, VRBS has been contracting with high schools across the state to provide Pre-Employment Transition Services (Pre-ETS) to all students with disabilities within the high schools and continues to do so. Schools in contracts are encouraged to annually renew contracts and to continually improve and enhance their contracted services. Schools not in contracts are annually re-invited to participate and re-informed of the benefits of contracting with VRBS. Additionally, Pre-ETS Specialists will meet with high school staff and other interested

parties to develop Pre-ETS contracts, initiate joint training, share best practices and facilitate communication between the parties.

### 3. The designated State unit's explanations for rejecting any of the Council's input or recommendations.

None of the Council's input was rejected. Each explanation was included immediately following the SRC comment. See previous section.

## b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

### 1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

No waiver requested.

### 2. The designated State unit will approve each proposed service before it is put into effect; and

No waiver requested.

### 3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

No waiver requested.

## c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

### 1. Federal, State, and local agencies and programs;

#### **Section 121 Vocational Rehabilitation Projects**

VRBS presently has cooperative agreements with all of the six Section 121 projects (Flathead Reservation, Fort Belknap Reservation, Fort Peck Reservation, Rocky Boy's Reservation, Northern Cheyenne Reservation and the Blackfeet Reservation) located in Montana. The purpose of these agreements is to establish procedures to assure continued coordination between the 121 projects and



VRBS. These agreements are implemented for the sole purpose of enhancing, to the greatest extent possible, the delivery of rehabilitation services to persons with disabilities living in the state of Montana and residing on or near the six reservations that currently have a tribal vocational rehabilitation project.

### **Mental Health**

This cooperative agreement has provisions that include:

1. To make available the required supported employment/follow-along services from community rehabilitation programs (CRPs) that are certified mental health providers. Follow- along services may be provided through community based psychiatric rehabilitation and support, and through case management services.
2. To serve persons identified as eligible for mental health service under Medicaid or the Mental Health Service Plan.
3. To strengthen supported employment services to Montana citizens eligible for vocational rehabilitation's supported employment services and for community mental health services funded by the Addictive and Mental Disorders Division.
4. To provide cross-training and technical assistance between our agencies.
5. To establish and evaluate annual goals for our interagency work towards coordinated vocational and support services.

### **Montana Small Business Development Centers (SBDCs)**

The purpose of this agreement is to establish guidelines and procedures to be used by the Montana Small Business Development Centers (SBDC) and VRBS in coordinating the services of both programs on behalf of individuals with disabilities who desire to pursue the goal of self-employment. This agreement outlines each party's role and responsibilities, referral procedures, information exchange methods, forms used, and implementation, evaluation, amendments and termination procedures.

### **The Randolph-Sheppard/Business Enterprise Program (BEP)**

The BEP program continues with three vendors. The program is at a point where it can consider starting one or two part-time routes if an interest is expressed by BLVS consumers to become a vendor.

### **Public Transportation Programs**

VRBS has MOUs with the public transportation programs in Great Falls and Billings, which are two of the larger cities in the state. The MOUs commit to procedures to assist VRBS's consumers to obtain documentation necessary to obtain transportation services at reduced fares.

### **Social Security Administration**

VRBS works with the Social Security Administration to collaborate on employment incentives and supports and maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program.

### **Cooperation in Training Activities:**

VRBS routinely collaborates with other organizations to provide training opportunities for VRBS' staff. The following is a list of collaborating organizations:

- University of Montana - Rural Institute on Disabilities
- Montana State University - Billings - Montana Center for Inclusive Education
- Centers for Independent Living

- Client Assistance Program
- Disability Determination Services
- Rocky Mountain Rehab
- Montana Association for Rehabilitation

## 2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

### **State Program under section 4 of the Assistive Technology Act of 1998 (MonTECH)**

Disability Employment and Transitions Division (DETD) has a contract with MonTECH to provide the required services of the Assistive Technology Act of 1998. Also, the two programs cooperate through:

1. Having a VRBS representative on the MonTECH advisory board,
2. Having a MonTECH representative on the VRBS Assistive Technology Team.
3. Training VRBS counselors in available assistive technology and how to access consumer evaluations related to assistive technology.

## 3. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

### **Department of Agriculture**

There is no Department of Agriculture project related to disabilities serving Montana at this time.

## 4. Non-educational agencies serving out-of-school youth; and

We do not currently have agreements with agencies serving out-of-school youth.

## 5. State use contracting programs.

### **State Use Contracting Programs Montana**

State agencies may purchase supplies and services from sheltered workshops or work activity centers. Such purchases are exempt from competitive bidding laws and rules. The Montana Department of Administration maintains a list of certified sheltered workshops or work activity centers located in the state. The list includes the supplies and services provided by each sheltered workshop or work activity center. (Administrative Rules of Montana 2.5.607).

VRBS does not currently make purchases related to this agreement.

## d. Coordination with Education Officials

Describe:

1. The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services,

as well as procedures for the timely development and approval of individualized plans for employment for the students

**Local School Districts:** VRBS has initiated multiple contracts with local school districts to provide pre-employment transition services (Pre-ETS) to high school students with disabilities aged 14-21. School districts develop work plans on how they will provide the five required components of Pre-ETS and are reimbursed quarterly based on the number of Pre-Employment Transition Services provided to students with disabilities who requested them. The school districts are required to provide VRBS with the documentation of services provided to students participating in Pre-ETS.

The most recent agreement with the Office of Public Instruction is from May 29, 2019.

**Information related to the process and responsibilities of LEAs (OPI) and the VR agency to document completion of activities required under Section 511 for those students pursuing subminimum wage employment:**

- OPI will require LEAs who work with students with disabilities seeking subminimum wage employment to send documentation of transition services/Pre-ETS provided to VRBS within 30 days of service delivery.
- For students with disabilities seeking subminimum wage employment, OPI will require the LEA to provide documentation to VRBS of transition and Pre-ETS services they provided. Documentation will be provided to VRBS within 30 days of service delivery.
- For students with disabilities seeking subminimum wage employment, OPI will require the LEA to provide documentation to VRBS of the student's refusal to participate in transition services.
- VRBS will inform OPI staff, teachers, students, legal guardians and parents of the mandates found in the Rehabilitation Act, which require the student with a disability exiting the LEA to be referred to VRBS prior to entering subminimum wage employment.
- For a student with disabilities seeking subminimum wage employment, VRBS will provide the individual with documentation of the required activities within the timelines specified under 34 CFR 397.
- For students with disabilities seeking subminimum wage employment who refuse to participate in transition services, VRBS will provide documentation to the student of their refusal to participate within the timelines specified under 34 CFR 397.

**Additionally, the section on coordination and documentation of subminimum wage employment that is included in the MOU between VRBS and OPI states the following:**

Under section 511 of Rehabilitation Act of 1973, no entity, including businesses which hold a special wage certificate as described in Section 14(c) of the Fair Labor Standards Act of 1958, may compensate any individual with disabilities who is 24 years of age or younger at subminimum wage, unless they have met specific requirements including participation in Transition or Pre-ETS, application for VRBS and receipt of career counseling, information and referral services. The purpose of Section 511 is to ensure that individuals with disabilities have access to information and services that will enable them to achieve competitive integrated employment.

**Responsibilities of OPI and LEAS under Section 511(d) of the Rehabilitation Act of 1973**

- OPI or LEAs may not enter into a contract or other arrangement with an entity for the purpose of operating a program for an individual age 24 or younger under which work is compensated at subminimum wage
- OPI will provide guidance to LEAs that when a student with a disability is known to be seeking subminimum wage employment, the LEA will share the specific requirements with the student, parents, guardians and teachers as soon as possible. This information should also be shared with participants during IEP meetings for transition planning.
- The student will be referred to VRBS and the Vocational Rehabilitation Counselor will be informed by the LEA that the student is known to be seeking subminimum wage.
- Pursuant to 34 CFR §397.30(b)(1), the LEA will provide VRBS with documentation that contains at a minimum, the: (i) Youth's name; (ii) Description of the transition services under IDEA and Pre-ETS completed; (iii) Name of the provider of the required service or activity; (iv) Date required service or activity completed; v) Signature of LEA personnel documenting completion of the required service or activity; (vi) Date of signature and (vii) Signature of LEA personnel transmitting documentation to VRBS; and (viii) Date and method (e.g., hand-delivered, faxed, mailed, e-mailed, etc.) by which document was transmitted to VRBS. The LEA Personnel must provide the documentation to VRBS as soon as possible upon completion of the required actions, but no later than 30 calendar days after completion of the required action or 60 days of additional time is needed due to extenuating circumstances. 34 CFR § 397.30(b)(2)(i). Extenuating circumstances should be interpreted narrowly to include unexpected lengthy absence due to illness or family emergency of LEA personnel necessary to produce the documentation due to illness or family emergency or a natural disaster. 34 CFR §397.30(b)(2)(i)(B). When the LEA personnel transmits the final determination or activity completed to VRBS, as required by 34 CFR §397.20 and 397.30(a), the LEA personnel must provide a cover sheet that itemizes the documentation that has been provided to VRBS regarding that student.
- 
- The LEA must retain a copy of all documentation provided to VRBS.
- The transmittal of all documentation from the LEA to VRBS will be consistent with the confidentiality requirements of the Family Education Rights and Privacy Act (FERPA) (20 USC 11232g(b) and 34 CFR 99.30 and 99.31) and IDEA (20 USC 1417(c) and 34 CFR 300.622).

#### **Responsibilities of VRBS under Section 511(d) of the Rehabilitation Act of 1973**

- Pursuant to 34 CFR § 397.20(a) documentation of the activities listed below must be provided by VRBS to the student in an accessible format, as soon as possible after completion of the required action, but no later than 45 calendar days after determination or completion of the required activity or service or within 90 calendar days if additional time is needed due to extenuating circumstances. 34 CFR §397.10(c)(2). Extenuating circumstances should be interpreted narrowly such as unexpected lengthy absence of VRBS personnel necessary for the production of the documentation due to illness, family emergency or natural disaster. 34 CFR § 397.10(c)(2)(B).
  - The individual has received transition services under (IDEA) or Pre-ETS through VRBS or the LEA
  - The individual has applied for VR services and been found ineligible; or applied and was found eligible for VR services and;
    - Had an IPE developed
    - Had been working toward an employment outcome with appropriate supports and services for a reasonable period of time (determined on an individual

basis, but up to 24 months for an individual with a supported employment outcome identified in their IPE) without success; and

- The individual's case is closed; and
  - Has been provided career counseling, and information and referrals to Federal and State programs and other resources in the individual's geographic area that offer employment-related services and supports designed to enable the individual to explore, discover, experience, and attain competitive integrated employment.
- If a youth with a disability or, as applicable, the youth's parent or guardian, refuses, through informed choice, to participate in the activities required by section 511 or the implementing regulations in part 34 CFR part 397, documentation must, at a minimum:
    - Contain the information in 34 CFR § 397.10(a)(2); and
    - The documentation of the youth's refusal must be provided to them in an accessible format within 10 calendar days of their refusal to participate 34 CFR §397.10(c)(2)(i).
  - The youth will be informed that their right of refusal to participate in the required activities outlined in this section will result in their inability to engage in employment at a sub minimum wage.

## 2. Information on the formal interagency agreement with the State educational agency with respect to:

### A. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

The following is from the MOU with the Office of Public Instruction that details the technical assistance responsibilities of each agencies.

#### **Consultation and Technical Assistance**

- VRBS will provide consultation and technical assistance to assist LEAs in planning for the transition of students with disabilities from school to post-school activities including Pre-ETS.
- VRBS Counselors will consult with and provide technical assistance to LEA administrators, school counselors, transition specialists, families, individuals, public and private stakeholders, community agencies, and teachers including those who work in special education, general education, career technical fields, etc.
- VRBS will provide consultation and technical assistance through informational sessions, face to face meetings, phone calls, conference calls, skype meetings, webinars, brochures, rack cards, and shared information on the agency website.
- LEA and VRBS staff will be encouraged to collaborate through their Regional Youth Transition Committees and Comprehensive System of Personnel Development (CSPD) Meetings in planning and implementing efforts that are focused on the transition of students with disabilities.

- VRBS counselors will provide consultation and technical assistance during their routine visits to the LEAs, during IEP meetings, at conferences, at training activities, and at other times as requested by OPI or LEAs.
- VRBS will disseminate information about transition services, Pre-ETS, processes for outreach, VR eligibility, scope of VR services, effective practices, training opportunities, funding strategies, assistive technology, and other relevant topics.

In addition VRBS has an MOU with Office of the Commissioner of Higher Education (OCHE).

The purpose of this MOU is to develop and adopt principles which will guide the planning and delivery of support services to individuals with disabilities who are mutual clients of Vocational Rehabilitation and Blind Services (VRBS) and students enrolled in the Montana University System (MUS). This MOU has provisions which include:

- VRBS and the units of the MUS maintain different requirements for determination of eligibility, documentation of disability, and the provision of services or accommodations. This MOU does not require either VRBS or MUS to alter its policies for providing services or supports, and this MOU is not to be used as a basis for determining eligibility for VRBS or MUS services.
- The units of the MUS through the guidance of the OCHE are required to provide services and accommodations to VRBS' clients to the same extent as they are provided to other students with disabilities, in accordance with Montana state law, the Americans with Disabilities Act of 1990 (PL 101-336) and Section 504 of the Rehabilitation Act (PL 93-112, as amended).
- VRBS is not prohibited in this agreement from contracting with units of the MUS to provide services or support for VRBS' clients beyond those required to assure equal access to equal educational opportunities.
- The MOU will provide both parties with the opportunity to enhance communication and the exchange of information regarding services offered by VRBS and the various campuses of the MUS.
- VRBS and the units of the MUS will work together to enhance cross-referrals of individuals with disabilities, as appropriate to each individual's needs. Personal information about the individual will not be shared without an appropriate release of information.
- The MUS will not require students who have a disability to apply for VRBS before providing services or support. For students who have applied for VRBS, the MUS will not deny or delay the provision of services or support while VRBS is in the process of determining eligibility for services.
- VRBS are provided pursuant to an individualized plan for employment (IPE) which is developed jointly by the rehabilitation counselor and the eligible individual. In those situations where referral has been made to campus disability support services, the appropriate disability services staff may also be involved in helping to develop the IPE.
- The VRBS' rehabilitation counselor and the MUS campus disability support services staff will respect the individual's right and responsibility to fully participate in all decisions regarding his or her vocational future. The IPE shall be developed and implemented in a manner that allows the individual an opportunity to exercise informed choice in selecting an employment outcome, the specific vocational rehabilitation services that are to be provided, the entity that will provide those services, and the methods that will be used to procure the vocational rehabilitation services.

## B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

The following are sections of the MOU with the Office of Public Instruction related to transition planning.

### **Transition Planning:**

- VRBS and OPI agree to work collaboratively to facilitate and coordinate the smooth transition of students with disabilities from school to post-school activities, including the receipt of Pre-ETS, transition services, and other vocational rehabilitation services.
- Pursuant to 34 CFR 300.321(b)(3), to the extent appropriate, with consent of the parent or adult student, VRBS will be invited to participate in IEP development meetings for shared students with disabilities, depending on availability. VRBS may participate in person or through use of alternative means such as conference calls or other methods. When VRBS is unable to attend the IEP meeting, LEA and VRBS will communicate regarding IEP goals and needed transition services after the IEP meeting.
- VRBS will provide assistance in transition planning for students with disabilities to facilitate development and completion of their IEPs. VRBS can provide information, technical assistance, case consultation and information/referral as needed for eligible or potentially eligible students.
- VRBS will coordinate with non-educational agencies such as juvenile justice, treatment facilities or foster care programs for referrals of co youth with disabilities. These youth will be encouraged to participate in transition services and programs to improve future employment opportunities.
- VRBS will inform LEA teachers of community events such as job fairs, transition fairs, and career days to introduce students with disabilities to possible career goals.
- LEA and VR staff will provide guidance and counseling to students with disabilities regarding post-school options such as employment, post-secondary education, vocational training, and adult education.
- VRBS shall determine the eligibility of all students with disabilities who have applied for VRBS services within 60 days from the date of application.
- VRBS and LEAs will collaborate on the provision of ongoing joint staff training on topics such as development and implementation of IEP's, Pre-ETS, accommodations under Section 504 and limitations on youth entering employment paying sub-minimum wage.
- VRBS and LEAs will work together to facilitate the local level engagement of potential employers to provide job shadows, paid and unpaid work-based learning opportunities, etc. for students with disabilities;
- VRBS, in collaboration with OPI/LEAs, will provide or arrange for the provision of Pre-ETS to all students with disabilities identified as requiring these services. (The coordination and provision of Pre-ETS is outlined in more detail below.)

## C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

The following are sections of the MOU with the Office of Public Instruction that deal with financial responsibilities of each agencies and related matters.

## **Roles and Responsibilities of Each Agency-**

### **Joint Responsibilities of OPI and VRBS:**

- OPI and VRBS shall jointly sponsor training for their respective staff members and LEA personnel. Training shall focus on existing and new State or Federal requirements or initiatives that impact the provision of services by both entities concerning education of individuals with disabilities, their transition from school to employment, vocational rehabilitation services, assistive technology, and the substance of this MOU.
- OPI and VRBS shall ensure that timely notice of training is provided to each other and to the LEAs as appropriate.
- OPI and VRBS shall each designate a single point of contact who will serve as the lead person to coordinate joint training programs, communicate with the respective programs and for collaboration of pre-employment transition services and transition activities.
- OPI staff and VRBS will be available to give joint presentations on pre-employment transition services at conferences such as MYTransitions.

### **Responsibilities of OPI:**

- OPI will facilitate and coordinate the smooth transition of students with disabilities from school to post-school employment-related activities, including working with VRBS to ensure the receipt of appropriate Pre-ETS, transition services, and competitive, integrated employment.
- OPI will host an Annual Joint Stakeholders meeting to network, collaborate, communicate and discuss issues regarding services for students and youth with disabilities.
- OPI will encourage LEAs to participate in local multi-agency Transition Team meetings.
- OPI will request that LEAs identify points of contact to work with the VRBS liaison assigned to each school.
- OPI will disseminate information regarding relevant training and workshops to VRBS including courses available through the Teacher Learning Hub.
- reach out to parents and students to make them aware of coordinated transition services and opportunities. Examples include the Montana Youth Leadership Forum (MYLF) and Movin' On campus programs.
- OPI will encourage LEAs to provide relevant resource materials to stakeholders, parents, families, guardians and students relating to the provision of Pre-ETS and other transition services.
- The OPI Data Accountability Specialist will provide the most recent Special Education State Child Count data upon request. A data driven estimate of the number of students receiving 504 accommodations in the state will also be provided upon request. The OPI Annual Performance Report which includes exit data information for students with disabilities will be shared with VRBS.
- OPI will require LEAs who work with students with disabilities seeking subminimum wage employment to send documentation of transition services/Pre-ETS provided to VRBS within 30 days of service delivery.
- For students with disabilities seeking subminimum wage employment, OPI will require the LEA to provide documentation to VRBS of transition and Pre-ETS services they provided. Documentation will be provided to VRBS within 30 days of service delivery.



- For students with disabilities seeking subminimum wage employment, OPI will require the LEA to provide documentation to VRBS of the student's refusal to participate in transition services.
- to provide the required documentation needed by VRBS prior to the provision of Pre-ETS and coordination of services. LEAs will be offered the opportunity to enter into a contract with VRBS to provide Pre-ETS to students with disabilities. LEAs will be provided funding based on the number of students with disabilities who receive Pre-ETS according to the contract fee schedule. LEAs providing Pre-ETS through a VRBS contract will be responsible for securing parent/guardian signatures on student Pre-ETS requests and release forms granting permission for VRBS and LEAs to exchange information.
- OPI will teach LEAs to inform VRBS of students with disabilities who may be in need of transition or pre-employment services through VRBS. OPI will encourage LEAs to inform VRBS as soon as students with disabilities are identified as having a disability regardless of whether the student intends to apply for VRBS services.
- OPI shall encourage LEAs to inform VRBS of students with disabilities who are disconnected or in danger or dropping out.
- OPI shall provide technical assistance to LEAs concerning the provision of FAPE including the responsibility to provide assistive technology to assist with the education of students approaching transition to independent living and employment as appropriate.
- OPI shall assist LEAs with coordination of vocationally related services with VRBS for eligible students. Coordination should commence in the early stages of transition. Vocationally related service coordination and corresponding agency responsibilities should be identified in the IEP and included on the student's IPE when appropriate.
- OPI shall encourage LEAs to inform VRBS of IEP meetings in advance to allow sufficient time for VRBS to participate, subject to parental approval. Development of vocational goals and objectives shall occur in collaboration with the IEP Team.
- OPI will identify needed Pre-ETS and transition services, to include as appropriate, a statement of interagency responsibilities or linkages with other entities (e.g. mental health agencies, Social Security Administration) beginning at age 14.
- LEAs are responsible for providing and paying for any transition service that is considered special education or related services necessary for ensuring a FAPE as required under IDEA. Special Education and related services similar to VR Services may include:
  - Interpreting services;
  - Psychological services;
  - Physical and occupational therapy;
  - Early identification and assessment of disabilities in children;
  - Counseling services, including rehabilitation counseling;
  - Orientation and mobility services;
  - Medical services for diagnostic or evaluation purposes;
  - Work experiences; and
  - Job coaching and support services.

**Responsibilities of VRBS:**

- VRBS Counselors will participate in the evaluation process of students who have applied for VRBS and subject to parental consent, in the development of IEPs for students with disabilities
- VRBS shall encourage former students who are still eligible for IDEA services to enroll again in school for further study and training to enhance their opportunities for employment. Such former students shall also be eligible for vocational rehabilitation services customarily provided by VRBS to adults over the age of 21.
- VRBS will provide assistive technology services relevant to functions outside those assistive technology services required to access the educational program.
- After the eligible individual exits the LEA, VRBS will continue to provide vocational services, i.e., vocational assessment, career exploration, job shadowing, vocational guidance and counseling, and other required services outlined in the IPE.
- VRBS will accept referral of students with disabilities during the transition planning process for the provision of Pre-ETS. Students are not required to apply for VRBS services to receive Pre-ETS.
- VRBS will provide consultation with LEA district staff on transition planning to prepare a student to move from school to work or post-secondary education in accordance with the student's unique needs as determined through the IEP process and provision of Pre-ETS.
- Although VRBS is currently operating under an Order of Selection, an IPE which is consistent with and which takes into consideration the eligible student's Individualized Education Program (IEP), their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice will be developed as soon as resources are available.
- Students with disabilities who apply for VRBS, are determined eligible and complete an IPE may receive services such as evaluation, career guidance and counseling, medical or psychological services, training, job development and placement services, rehabilitation technology or other services to help them enter and maintain employment.
- VRBS will provide or arrange for the provision of services required by the IPE goal, when the student has been determined eligible for VR and the services are specific to his/her employment outcome and are not services customarily provided to the student by the LEA under the IDEA.
- VRBS Staff will provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs for Pre-ETS.
- VRBS is responsible for providing information to parents and/or guardians, students and teachers regarding VR eligibility, vocational assessment for employment and postsecondary planning and the CAP.
- VRBS will offer students who wish to apply for VRBS the opportunity to complete and sign a VRBS application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VRBS will be determined within 60 days. Students who are only interested in Pre-ETS and do not wish to apply for VRBS services will be given the opportunity to complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under 18 years of age, the application and Request Form will be signed by a parent or guardian.
- VRBS will obtain written consent for the release of confidential information, pursuant to VRBS policy and procedures, federal and state laws and regulations regarding confidentiality.
- VRBS will share information regarding policies, procedures, guidelines, programs and services for the purpose of improving the access to, and availability of, transition services.

- VRBS will provide brochures and materials about the VR process and services to the LEAs for distribution to students, parents, legal guardians, teachers and others. VRBS staff will also be available to provide information on changes in the law or VRBS policy regarding transition services.
- VRBS will promote employer participation in providing opportunities for work-based learning for students with disabilities.

VRBS is responsible for coordinating the provision of Pre-ETS.

- VRBS will inform OPI staff, teachers, students, legal guardians and parents of the mandates found in the Rehabilitation Act, which require the student with a disability exiting the LEA to be referred to VRBS prior to entering subminimum wage employment.
- For a student with disabilities seeking subminimum wage employment, VRBS will provide the individual with documentation of the required activities within the timelines specified under 34 CFR 397.
- For students with disabilities seeking subminimum wage employment who refuse to participate in transition services, VRBS will provide documentation to the student of their refusal to participate within the timelines specified under 34 CFR 397.
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- The VRBS Youth Services Specialist will oversee the implementation of their “Adopt a School” program. Adopt a School builds relationships between local schools and VRBS by establishing regular office hours at larger high schools for Vocational Rehabilitation Counselors. These counselors connect students with disabilities to VRBS and establish collaborations with special education teachers and 504 coordinators, teachers, school administrators and parents, advocacy groups, and others regarding the role of VRBS in transition.
- The VRBS

### **Financial Responsibilities:**

Montana is a local control state in which LEAs are financially responsible for the costs of services they are mandated to provide under the IDEA and Section 504. OPI shall encourage and promote financial agreements between LEAs and VRBS. Such agreements may be made on an individual basis and in consultation with all parties including students, their families, LEA staff, and vocational rehabilitation professionals.

- OPI and VRBS commit to the implementation of complementary programs to assist with the provision of transition and Pre-ETS to students with disabilities in the state, including students with the most significant disabilities, to enable them to achieve an employment outcome in a competitive integrated setting;
- VRBS will provide funding to LEAs for the provision of Pre-ETS to students with disabilities as outlined in individual contracts and according to the contract fee schedule.
- OPI and LEAs are financially responsible for the cost of services they are mandated to provide under IDEA, Part B; including transition services that are considered special education or related services that are necessary for ensuring a FAPE to children with disabilities. Nothing in this MOU will be construed to reduce any obligations under the IDEA.
- VRBS is financially responsible for the cost of services for eligible VR students where the purpose of the services is to support an employment goal.

- Under 34 C.F.R.53, the availability of Comparable Services and Benefits, as defined in 34 C.F.R. §361.5(c)(8), will be determined by VR unless such a determination would interrupt or delay the progress of the individual: toward achieving the employment outcome identified in the IPE; an immediate job placement; or the provision of VR services to individual determined to be at extreme medical risk.

The previously mentioned MOU with the OCHE also deals with financial responsibility.

VRBS' clients who attend a unit of the MUS may need reasonable accommodation, including auxiliary aids or services in order to have equal access to the programs and services offered at that particular institution.

The provision and cost of reasonable accommodations are the responsibility of the particular unit of the MUS. For individuals with disabilities who are mutual clients of VRBS and students at a unit of MUS, and are otherwise qualified for such aids or services, the funding source for auxiliary aids and services will be determined on an individual case-by-case basis.

The MUS unit will provide the appropriate VRBS/ office with an estimate of the number of hours and cost of interpreter services which will be billed to VRBS prior to the start of services.

- The VRBS' office must authorize payment for the interpreter services prior to the start of services.
- VRBS and the MUS unit will require full compliance with the Registry of interpreters for the Deaf (RID) Code of Professional Conduct.

In addition:

Physical disabilities are included in the agreement to split evenly the cost of auxiliary aids and services.

Pre-approval of any cost sharing agreements needs to be obtained prior to the start of the service.

Documentation of services delivered must be provided to VRBS that meets or exceeds state auditing requirements.

Additional guidelines relative to interpreter services for eligible clients/students:

- The MUS unit will be responsible for procuring and paying interpreters. VRBS will reimburse for its share of the cost.
- The MUS unit will provide the appropriate VRBS/ office with an estimate of the number of hours and cost of interpreter services which will be billed to VRBS prior to the start of services.
- The VRBS' office must authorize payment for the interpreter services prior to the start of services.
- VRBS and the MUS unit will require full compliance with the Registry of interpreters for the Deaf (RID) Code of Professional Conduct.

Lastly:

- Physical disabilities are included in the agreement to split evenly the cost of auxiliary aids and services.

- Pre-approval of any cost sharing agreements needs to be obtained prior to the start of the service.
- Documentation of services delivered must be provided to VRBS that meets or exceeds state auditing requirements.

## D. Procedures for outreach to and identification of students with disabilities who need transition services.

The following section of the MOU with the Office of Public Instruction describes procedures of outreach and identification of students with disabilities needing transition services.

### **Outreach Identification:**

- VRBS assigns a Vocational Rehabilitation Counselor to each public high school in the state. Counselors shall inform students, families, special and regular education teachers, school administrators, advocacy groups, and others about VRBS.
- Counselors will give presentations and distribute both print and electronic materials that explain transition and pre-employment services along with traditional vocational rehabilitation services. The information provided will include a description of the purpose of VRBS, eligibility requirements, application procedures and scope of services that may be provided to eligible and potentially eligible individuals.
- Students who wish to apply for VRBS services will be offered the opportunity to complete and sign a VRBS application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VRBS will be determined within 60 days. Students who are only interested in Pre-ETS and do not wish to apply for VRBS services will complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under 18 years of age, the application and Request Form will be signed by a parent or guardian.
- OPI shall assist the LEAs with methods and procedures for outreach and identification of students and families who may benefit from VRBS. Assistance with the methods and procedures should include actions needed to engage those who are not aware of VRBS, including how the LEAs identify and work with transition aged students who may be in alternative high schools, residential facilities, or are incarcerated.
- VRBS will reach out to eligible and potentially eligible students with disabilities who are in need of transition services and Pre-ETS as early as possible through outreach activities such as information sharing at IEP's, transition planning meetings, career fairs, orientations, back to school nights, work with parent support groups, and other activities.
- VRBS Counselors will work with LEA staff to identify and reach out to all students with disabilities to include those served in special education, those receiving an accommodation under Section 504 of the Rehabilitation Act of 1973, and other students and youth with disabilities. Outreach activities will include students with disabilities receiving school psychological, health, nursing or social work services, and students with disabilities enrolled in an educational program and not in special education. VRBS will also reach out to youth with disabilities who have dropped out of an education program or students who are at risk of dropping out of high school.
- VRBS will inform students with disabilities about the availability of and opportunities to exercise informed choice; including the availability of support services for individuals with the most significant disabilities who require assistance in exercising informed choice throughout the vocational rehabilitation process;

- The designated VRBS Counselor will work closely with each LEA to coordinate, identify students and implement Pre-ETS. VRBS will provide the necessary forms and templates for required documentation including Student Request Forms for Pre-ETS.
- VRBS will work with the LEA to ensure collaboration between transition services provided under IDEA and the Pre-ETS provided by VRBS through direct provision of services or through contracts with LEAs and other providers.
- 
- Not all eligible or potentially eligible students with disabilities will require all five required activities, however, all should receive all *needed* services, as determined through informed choice and consultation with each student based on their strengths and needs and consistent with their IEP, when applicable.

## e. Cooperative Agreements with Private Nonprofit Organizations

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

The designated state unit contracts with for-profit and non-profit providers of vocational rehabilitation services. Vocational Rehabilitation and Blind Services (VRBS) operates on a purchase-of-service basis. We have identified and enrolled rehabilitation providers who meet qualification standards established by the designated state unit. VRBS' staff communicates regularly with the providers regarding fee structures, services provided, and consumer satisfaction.

VRBS requires Community Rehabilitation Providers (CRP) to accept a set fee for service, but does not guarantee a minimum level of consumers to be referred. The contract used with CRPs follows the master contract developed by the Department of Public Health and Human Services (DPHHS) legal unit to cover liability and related issues. Services purchased by VRBS from CRPs are directly approved from the VRBS' counselors utilizing an authorization process. The amount of services purchased depends upon the amount and type of services needed by the consumer. Agencies eligible to receive authorizations must be enrolled vendors and must be current service providers of DPHHS; or have accreditation from the Commission on Accreditation of Rehabilitation Facilities (CARF) or Rehabilitation Services Accreditation System (RSAS). In a limited number of cases, individuals with appropriate backgrounds are authorized to provide services in remote rural areas where a DPHHS, RSAS or CARF provider is not available.

## f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

**Mental Health and Developmental Disabilities** are important stakeholders in providing supported employment services. Their contributions are described later as they have their own sections below.

**Enrolled CRPs:** VRBS works with a number of community-based organizations across the state. Many are enrolled as extended support service providers to assure quality in service delivery for consumers. VRBS has enrolled programs in mental health services, developmental disabilities, as well as other disability organizations to provide these services at the local level.

## g. Coordination with Employers

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

### 1. VR Services; and

VRBS coordinates with businesses through several avenues, including actions and activities that are designed to enhance efforts to identify competitive integrated employment and career exploration opportunities for Montanans with disabilities. These actions facilitate the provision of VR services and transition services, including pre-employment transition services.

These actions include:

- Making direct contact with businesses to learn about their services, market position, goals and workforce needs.
- Attending and participating in community meetings such as Chamber of Commerce functions, Society of Human Resource Managers, Job Service Employer Councils and Economic Development meetings.
- A standalone VRBS Business Services website for businesses to use to learn about the services we have to offer and printed resource materials describing our services.
- Coordination with Montana Workforce Centers to input and collect data on Business Services using the MWORKS data base. This allows VRBS to collaborate with the Workforce Centers and document ongoing relationships with business and ensure deliverables and services are provided.
- Improved knowledge of Labor Market Information and how to incorporate this information into Business Services practices
- Business Services Team members are Windmills curriculum trainers. This training is used as an employer-employee awareness program specifically addressing attitudinal barriers.

### 2. Transition services, including pre-employment transition services, for students and youth with disabilities.

Agreements with private and non-profit providers related to transition include the following:

**Montana Youth Transition (MYTransition):** VRBS provides funding and collaboration with MYTransitions to provide:

- An annual conference on Montana Transition activities with separate tracks for school personnel, adult service personnel, parents, and youth, along with combined sessions for developing coordination.

**Montana Youth Leadership Forum (MYLF {pronounced my life})** VRBS provides funding and collaboration for the week-long forum for approximately 20 youth with disabilities. The forum focuses on developing a plan for contributing to the community, self-advocacy, soft skills, adult resource identification and a variety of other skills and abilities related to transition. VRBS also provides funding for follow-up and MYLF Step II for those who participated in the MYLF Forum. MYLF Minis are offered in rural areas to allow students with disabilities to participate in a condensed format.

**Counselor-purchased Pre-ETS services:** VRBS is contracting with several private, for- and non-profit community rehabilitation providers and other groups (e.g., centers for independent living) for services and activities in all five of the core Pre-ETS service categories.

As mentioned before, VRBS also contracts with local school districts on developing and providing pre-employment transition services based on the individualized needs of the local area. The pre-employment transition work plan is developed by the local schools, VRBS personnel and other stakeholders.

VRBS has collaborated with the University of Montana and Montana State University-Billings to develop "Movin' On," a VRBS funded program, where approximately 30 youth with disabilities participate in a week-long activity on college campuses to explore post-secondary education as a transition option. The program exposes students to the campus, college type classes, disability services and other aspects of post-secondary education. The University of Montana will not be providing the service this year but we hope to re-enter into this relationship in the future.

## **h. Interagency Cooperation**

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

### **1. The State Medicaid plan under title XIX of the Social Security Act;**

#### **Interagency Cooperation**

VRBS will continue to collaborate and work towards a cooperative agreement with the Department of Public Health and Human Services, the state agency responsible for administering the state Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.) that outlines the roles and responsibilities of all parties regarding the delivery of VR services and long-term support services for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program.

Also, VRBS works closely with the Social Security sponsored Work Incentives Planning and Assistance project in Montana to assist consumers to understand the impact of working on their benefits, including Medicaid.

It is anticipated that additional cooperative agreements with the state Medicaid agency and service agencies funded through Medicaid will be developed in the upcoming year to respond to changes made in WIOA legislation.

The description of how VRBS will collaborate with the Developmental Disabilities Program's Medicaid Waiver Program and the Medicaid services through Mental Health are described in a future section.

### **2. The State agency responsible for providing services for individuals with developmental disabilities; and**

VRBS has had a long and productive relationship with the Developmental Disabilities Program (DDP), including a recently completed new cooperative agreement. The program continues to sign off for extended long-term support services for many individuals with significant disabilities. As mentioned previously, cross-training and technical assistance between our agencies to make available the required supported employment services continues to be ongoing.

- The short-term services to be provided through CRPs enrolled by VRBS.
- The long-term follow-along services to be provided by DDP through developmental disability providers. DDP services are funded through the state general fund and the Medicaid home and community waiver.



### 3. The State agency responsible for providing mental health services.

VRBS has a negotiated cooperative agreement with the Addictive & Mental Disorders Division. The cooperative agreement provides guidance for: cross-training and technical assistance between our agencies, establishment and evaluation of annual goals for interagency work towards coordinated vocational and support services, and makes available the required supported employment/extended support/follow-along services from enrolled community rehabilitation programs (CRPs) and certified mental health providers.

## i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

### 1. System on Personnel and Personnel Development

#### A. Qualified Personnel Needs

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

The Comprehensive System for Personnel Development (CSPD) information is currently maintained by the Quality Control Officer (QCO) of the Vocational Rehabilitation and Blind Services (VRBS) program. The QCO developed and maintains a spreadsheet comprised of all personnel and each member's respective CSPD status: 1) those who hold both a master's degree and CRC, 2) those who are in training assignments working toward their master's degree and CRC, and 3) those who have been newly hired and are preparing to begin graduate studies.

The spreadsheet is updated whenever a new staff member is hired, signs a CSPD agreement, enters graduate school, earns a master's degree, and obtains a credential (e.g., CRC). The information is regularly shared with the program administrator to assist in the staffing decisions.

The following table illustrates the number served per year, the number of personnel per position, and the approximate caseload size of case carrying staff member.

Please note that the number served progressively decreased after VRBS entered Order of Selection (OOS), closing Category III in the fall of 2015, Category II in the summer of 2016, and Category I in the spring of 2017.

#### **Number Served Per Year:**

FY2018 - 4564

FY2019 - 1964

Number of Personnel Per Category	FY2018	FY2019
Counselors	21	19
(regular VR and BLVS counselors carrying full caseloads)		
Counselor Supervisors	6	12
(regular VR and BLVS supervisors carrying partial caseloads)		
Administrative Staff	33	33.5
Orientation & Mobility Specialists	3	3
Vision Rehabilitation Therapists	3	4
<b>Total Staff</b>	<b>66</b>	<b>71.5</b>

Approximate Caseload Size per Position per Year	FY2018	FY2019
Counselors Carrying Full Caseloads	<b>190</b>	<b>80</b>
Counselor Supervisors Carrying Partial Caseloads	<b>95</b>	<b>37</b>

ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

In FY2018, VRBS served 4564 Montanans with disabilities, wherein each counselor carrying a full caseload served approximately 190 consumers each, and counselor supervisors carrying a partial caseload served approximately 95 consumers each.

In FY2019, VRBS served 1964 Montanans with disabilities, wherein each counselor carrying a full caseload served approximately 80 consumers and counselor supervisors carrying a partial caseload served approximately 37 consumers.

The population in western Montana continues to grow, while the population in eastern Montana decreases. Yet, Eastern Montana has such large travel distances for counselors to meet with consumers that a reduction of staff in less populated parts of the state is not feasible.

When all the positions are filled, VRBS has had enough staff to provide vocational rehabilitation services throughout the state. However, as the population continues to grow, it is conceivable the need for additional staff will grow, too. Additionally, as mentioned elsewhere in this report, VRBS recently added a new **Pre-Employment Transition Services (Pre-ETS)** Bureau to better meet the transition needs of youth with disabilities. The new **Pre-ETS** Bureau will be adding designated **Pre-ETS** counselors in its field offices. Future CSPD reports will reflect growth in this area.

**Also refer to table below (and in section i. 1. A. iii.) for further information relevant to this section. Specifically, the first column in the table, labeled "Total Positions," represents VRBS fully staffed and/or the total personnel Needed to provide VR services. Historically, this has been the number of staff necessary to serve clients when VRBS is not in Order of**

**Selection.** The 3<sup>rd</sup> column, “Vacancies,” represents the number of vacancies when this report was written.

Personnel by Job Title (Current as of 1/31/2020)	<u>Total Positions/Total Personnel Needed</u>	<u>Filled Positions</u>	<u>Vacancies</u>	<u>Projected Vacancies Over Next 5 Years</u>
Division Administrator	1	1	0	
Bureau Chiefs (Program Support; Field, Pre-ETS)	3	3	0	
Prog Managers (Independent Living; Deaf; Soc Sec; Quality Control; Transportation; Business Services; BLVS Administrator)	7	7	0	2
Central Office Admin Support Staff	1.5	1.5	0	
Counseling Staff (Counselors and Counselor Supervisors for both General Program & BLVS Program)	47	31	16	5
Orientation and Mobility Specialists	4	4	0	
Vision Rehabilitation Therapists	4	3	1	

iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Personnel by Job Title (Current as of 1/31/2020)	Total Positions	Filled Positions	Vacancies	Projected Vacancies Over Next 5 Years
Division Administrator	1	1	0	

Personnel by Job Title (Current as of 1/31/2020)	Total Positions	Filled Positions	Vacancies	Projected Vacancies Over Next 5 Years
Bureau Chiefs (Program Support; Field, Pre-ETS)	3	3	0	
Prog Managers (Independent Living; Deaf; Soc Sec; Quality Control; Transportation; Business Services; BLVS Administrator)	7	7	0	2
Central Office Admin Support Staff	1.5	1.5	0	
Counseling Staff (Counselors and Counselor Supervisors for both General Program & BLVS Program)	47	31	16	5
Orientation and Mobility Specialists	4	4	0	
Vision Rehabilitation Therapists	4	3	1	
Field Administrative Support	23	19	4	5
Tech Sup (Budget Manager; Budget Analyst; Business Analyst; Technology Assistant)	4	4	0	
<b>Totals</b>	<b>94.5</b>	<b>73.5</b>	<b>21</b>	<b>12</b>

## B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

In the system described above, the Quality Control Officer maintains records regarding the number of employees in CSPD plans, the institutions in which they are completing graduate studies, and the dates upon which they complete earn their respective degrees and credentials.

Montana VRBS requires professional counseling and supervisory staff to have a master's degree in Rehabilitation Counseling. The Certified Rehabilitation Counselor credential is preferred. Toward that end, VRBS has incentivized the credential by providing a pay raise for those who earn their CRC credential.

The agency seeks to hire fully qualified individuals whenever possible. However, due to the rural location and lower wages, it is difficult to recruit fully qualified candidates. Consequently, VRBS often hires excellent candidates who are willing and able to participate in a training assignment, wherein they learn (complete master's degree) while they earn.

Newly hired trainees are provided information (CSPD Agreement and Graduate School Tip Sheet) and support to help them select a graduate school that offers both online education and the Rehabilitation Services Administration (RSA) Scholarship. To mitigate expense of graduate school, VRBS has worked hard to foster positive relationships with schools offering the RSA scholarship. To date, all of our trainees have been accepted to the school of their choice.

Montana State University is the only institution in Montana that offers Rehabilitation Counseling degrees. Unfortunately, MSU does not offer the RSA scholarship. Understandably, trainees are encouraged to seek training at institutions offering the RSA scholarship.

Currently, 100% of VRBS professional counseling and supervisory staff (33) meet the agency's CSPD standard: 22 are Certified Rehabilitation Counselors, and 11 are in CSPD plans. Of the 11 in CSPD plans, 5 are in graduate school, 4 are eligible to sit for the CRC exam, and 2 are preparing to enter graduate school.

The following tables illustrate the data noted above.

Institution	Degree Offered	Number Graduated in FY2018	Number Graduated in FY2019	Number Graduated in FY2020 to date	Number Currently Enrolled
<b>West Virginia University</b>	Rehabilitation Counseling	1	2		
<b>Utah State University</b>	Rehabilitation Counseling		1		3
<b>University of Kentucky</b>	Rehabilitation Counseling			1	
<b>University of Massachusetts</b>	Rehabilitation Counseling				1
<b>George Washington University</b>	Rehabilitation Counseling				1

Institution	Degree Offered	Number Graduated in FY2018	Number Graduated in FY2019	Number Graduated in FY2020 to date	Number Currently Enrolled
<b>Western Michigan University</b>	Orientation & Mobility		1		
<b>Hunter University of New York</b>	Vision Rehabilitation Therapy			1	
<b>Total</b>		<b>1</b>	<b>4</b>	<b>2</b>	<b>5</b>

ii. The number of students enrolled at each of those institutions, broken down by type of program; and

Information for this section is reported above in the table found in Section i.1.B.i.

iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Information for this section is reported above in the table found in Section i.1.B.i.

## 2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

### Recruitment & Retention

VRBS has had marked difficulty attracting qualified candidates due to low base wage, especially the trainee base wage. Moreover, VRBS has undergone significant turnover in the recent past, losing several fully qualified staff for better paying positions elsewhere. In 2019, in response to the aforementioned recruitment and retention difficulties, VRBS modified its existing wage progression to increase the base trainee wage from \$16.75 to \$17.50 per hour. Additionally, as of this writing, there are efforts being undertaken to further increase the wage range to a level that is closer to the current market level, and one that is commensurate with other state employees performing similar work.

Montana has no state university training for either Vision Rehabilitation Therapy or Orientation and Mobility. Therefore, attracting highly qualified professionals in these areas will continue to be a challenge for BLVS. Likewise, Blind and Low Vision Services (BLVS) staff continue outreach efforts to attract candidates from across the country to fill Vision Rehabilitation Therapist and Orientation and Mobility Specialists. In other cases, BLVS must hire someone locally on a training assignment and pay for their schooling.

Montana VRBS believes in a personnel body that is representative of its constituents. Likewise, VRBS works with Montana colleges and other entities to recruit individuals from minority backgrounds, including Montana's tribal peoples and persons with significant disabilities. VRBS takes affirmative action to employ and advance in employment, qualified individuals of minority all minority status, including Native Americans and with people with significant disabilities.

## Preparation

All new employees undergo VRBS Foundations Training to 1) establish an understanding of the values that underpin the mission of our profession, and 2) teach best practices that promote efficiency and excellence in the service of our consumers.

All employees are encouraged to build leadership skills via service on a variety of task teams wherein challenges are addressed and solutions are developed. Current teams include: Procedure and Policy Team; Internal Controls Team; Quality Controls Team; Youth Services Team; Business Services Team; Life Support Team (Administrative Support); and the Assistive Technology Team.

## 3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

As noted above, VRBS requires a master's degree for its professional staff (i.e., Rehabilitation Counselors, Orientation and Mobility Specialists, and Vision Rehabilitation Therapists) and desires that professional staff obtain relevant credentials (i.e., CRC; CVRT, COM).

As of this writing, 100% of Counseling staff and 87% Blind and Low Vision Staff meet the CSPD standard of Montana VRBS. (One Vision Rehabilitation Therapist position is currently vacant.) See tables below.

Number	22 of 33	11 of 33	33
Percentage	.666%	.333%	<b>100%</b>

		Certified Vision Rehabilitation Therapists	Total Number BLVS Staff who meet the VRBS CSPD Standard
Number	4 of 8	3 of 8	7 of 8
Percentage	50%	.375%	<b>.875%</b>

B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

Since our last report, VRBS has made significant progress in preparing staff to meet the needs of both individuals with disabilities and employers in a 21<sup>st</sup> century workforce.

Specifically, VRBS has:

- Produced outreach materials to educate employers on the services available to them from VRBS
- Provided Windmills training to employers to increase the disability awareness in the workplace
- Committed to maintained regular employer outreach efforts to carry out the Business Services mandates of WIOA
- Conducted annual outreach to those working in jobs paying subminimum wage to educate them about the option of work in competitive integrated settings
- Developed a comprehensive pre-employment transition service platform from which to serve youth with disabilities in concert with educators and community rehabilitation providers, moving them through high school graduation to post-secondary education and competitive employment.

## 4. Staff Development

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

VRBS solicits and/or identifies training needs through a variety of means: Training Needs Surveys; regular case review findings; and emerging topics in rehabilitation. Identified training needs are met via monthly All Staff Webinars, annual All Staff Conferences, and external training events offered by reputable entities included but not limited to: Montana Association for Rehabilitation; Montana Youth Transitions; Association for Education and Rehabilitation of the Blind and Visually Impaired.

VRBS is mindful of the continuing education needs of its credentialed staff and endeavors to develop and deliver internal training approved for CEUs and/or identify, share, and approve relevant external training activities.

B. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.



**Acquisition:** VRBS has developed solid working relationships with several national technical assistance centers (e.g., WINTAC; Rural Institute on Disability; CSAVR) to keep apprised of emerging knowledge and best practices in their focus areas.

**Dissemination:** VRBS leadership and many members of its staff body receive announcements of publication from several reputable and rich sources of information including but not limited to: WINTAC, RRI, OSERS, ODEP, and CSAVR. Notifications of current publications in relevant vocational rehabilitation topics are emailed to staff regularly. Additionally, these topics are discussed for inclusion in ongoing staff training **and presented in various formats including but not limited to local office staff meetings and monthly All-Staff Training sessions as well as in-person annual All-Staff meetings, webinars, articles, and emails among others.**

## 5. Personnel to Address Individual Communication Needs

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

VRBS requires that rehabilitation counselors who are hired specifically to work with deaf and hard of hearing consumers work to develop fluency in sign language skills. Sign language interpreters for the deaf or hard of hearing are also provided when necessary. Other accommodations, such as documentation in alternative formats, are routinely made by VRBS. The policy of VRBS is to consult with the consumer to determine the most appropriate mode of communication.

Montana has a relay system for telephone communication with consumers who are deaf or hard of hearing and all offices are equipped with communication devices: Ubi-Duos. Three offices (with the highest numbers of deaf/hard of hearing clients) have video phones for enhanced communication. The Montana Telecommunications Access Program is housed in the Disability Employment and Transitions Division and lends tremendous technical support to the staff of VRBS working with sensory impaired consumers. BLVS has also developed a full time Assistive Technology Specialist position. VRBS purchases interpreter services as needed by consumers.

The issue of consumers whose primary language is not English is a very rare issue in Montana. The issue is most likely to occur with Native American consumers who are the largest minority group in Montana. Even with this group, it is quite rare to have a consumer whose primary language is not English. Montana is fortunate to have six Native American vocational rehabilitation projects (funded through section 121 of the Rehabilitation Act) located in Montana. The local offices have good working relationships with the Native American projects and they are an excellent resource for assisting Native Americans who are not English speakers.

The Billings region has the largest population of Spanish speaking consumers and they have utilized assistance from the local migrant council when working with consumers whose primary language is Spanish.

In other very rare instances when working with consumers who speak other languages as their primary language, counselors have been able to utilize family members of the consumer to interpret. Also, Montana has colleges and universities that offer a variety of foreign languages and, if necessary, it may be possible to utilize instructors or students from these programs to assist with interpreting or identifying community resources to assist with communication.

## 6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

The VRBS CSPD coordinates with the requirements of the CSPD under the Individuals with Disabilities Education Act (IDEA).

Since the advent of VRBS's Transitions program in 2007, VRBS staff have become embedded in schools across the state, creating a more cohesive transition experience for students and their support teams. VRBS continues to coordinate training between VRBS, OPI, and the schools. Together, VRBS staff and school staff work annual events for transition aged youth, including transition fairs, the Montana Youth Transition Conference, and Montana Youth Leadership Camps. Montana VRBS has embraced the WIOA mandate to further improve service to students with disabilities with the establishment of a Pre-Employment Transition Services (Pre-ETS) Bureau and dedicated staff to serve students in our schools.

## j. Statewide Assessment

1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

A. With the most significant disabilities, including their need for supported employment services;

Each VR program is required to conduct a statewide assessment every 3 years. The currently completed 3-year Needs Assessment was a statewide assessment, jointly conducted by Vocational Rehabilitation and Blind Services (VRBS) and the State Rehabilitation Council (SRC). This assessment examined the need to establish, develop, or improve community rehabilitation programs, and the rehabilitation needs of individuals with disabilities, particularly the vocational rehabilitation needs of:

- Individuals with the most significant disabilities including their needs for supported employment services;
- Individuals who are minorities and individuals with disabilities who have not been served or are underserved by VRBS;
- Individuals with disabilities served through other components of the statewide workforce investment system;

Three types of input were analyzed:

- Direct inputs such as the consumer satisfaction survey, VRBS counselor survey, focus forums (small regional groups of consumers), consumer survey related to status 30 contacts, and the public hearings.
- Other indicators such as the Client Assistance Program report of needs, SRC input, demographic trends, involvement with the State Employment Leadership Network (SELN), program evaluation tools (such as the standards and indicators and federal annual report), and our current strategic plan summary.
- Priorities from other programs such as the federal priorities, and legislative priorities.

Method:

Consumer satisfaction surveys are sent to consumers of VRBS each three years of the assessment: approximately 1,750 surveys are sent out each year. The survey response rate is between 20 and 25 percent each year.

Public hearings are held of the three years of the assessment, with each providing general input on improving the VRBS program and input on the draft goals, activities and performance measures of the VRBS' strategic plan. Teleconferencing sites are located in Billings, Bozeman, Butte, Great Falls, Glasgow, Helena, Kalispell, Miles City and Missoula. Tribal sites are being considered for the present round of solicitation of comments. Participation at the statewide public hearings typically ranges between 60 and 100 clients. Written and electronic comments are also accepted.

## B. Who are minorities;

According to 2010 census data 89.4% of Montana's population is white and 6.3% is American Indian or Alaska Native persons. Persons reporting two or more races made up 2.5% of the population. In Montana, for most persons reporting two or more races, at least one of the races would be American Indian. Other minorities make up the remaining 1.8% of the population. Six Section 121 American Indian VR projects are located in Montana, covering six of the seven reservations located in Montana. Although most American Indian on or near the reservation prefer to be served by their Section 121 project, a number are served by VRBS or by both VRBS and the Section 121 project. In FY 2013, VRBS served 1,425 minority consumers (17.6% of the caseload), of which 719 were American Indian, 326 were of two or more races, 81 African Americans, 29 were Asian American, 250 were Hispanic/Latino and 20 were Hawaiian or Pacific Islander. The majority of American Indian Montanans live on reservations. Many more live just outside the reservation. However, Montana does have a number of urban areas that have significant numbers of American Indian residents. This population is served by American Indian service centers (Billings, Butte, Helena, Missoula, and Great Falls). Staff of VRBS maintain contact with the American Indian Services Centers to seek appropriate referrals and to obtain information on the needs of American Indians with disabilities residing away from reservations. Input on issues related to serving American Indians with disabilities was received from Section 121 Directors and public hearings conducted on reservations. Input received included:

- The Crow Nation should be encouraged to apply for a tribal vocational rehabilitation project
- There is a need for independent living services on the reservations
- There is a need for assistance related to the Ticket to Work Program
- Montana VRBS' counselors need to make appropriate follow up when there are referrals from a tribal vocational rehabilitation project
- There is a need for assistance related to assistive technology
- Transportation difficulties limit access to employment on reservations
- It is difficult to develop plans for employment due to lack of resources on the reservation
- There are problems getting good documentation of disability. Indian Health records are available, but often there is a wealth of information that is provided with little of the information relevant to the person's disabling conditions, particularly impediments to employment. Setting up appointments to get adequate documentation is difficult. Psychological testing and other specialty testing often requires going to a site off the reservation
- There is a lack of job opportunities on the reservations and many of the consumers are not interested in leaving the reservation
- There is a lack of sheltered and supported employment opportunities on reservations
- There is also some difficulty serving hearing impaired persons on the reservations, but on the Blackfeet reservation there have been some procedures developed that have been successful
- There needs to be assistance for helping tribal members develop their own businesses
- It is difficult to identify tribal members who have hidden disabilities

### C. Who have been unserved or underserved by the VR program;

In recent years, the disability makeup of the VRBS caseload has significantly changed. In 1986, 69% of the consumers had physical disabilities, 19% had mental disabilities, and 12% had sensory disabilities. In 2013, 34% of the consumers had physical disabilities, 54% had mental disabilities, and 12% had sensory disabilities. The number of cases with mental disabilities has significantly increased, especially in areas like severe and persistent mental illness, learning disabilities and attention deficit hyperactivity disorder. While the numbers served have grown, the fact that many of the VRBS' staff have had less experience working with this population has led to the SRC considering consumers with mental disabilities an underserved group because VRBS counselors may not be able to provide the same level of quality with this group of consumers. Findings of the comprehensive statewide needs assessment for individuals with mental disabilities including severe and persistent mental illness include:

- The need for more mental health centers to provide job placement and supported employment services
- More information regarding Social Security Work Incentives
- Improved transportation options
- Better communication between VRBS and the Addictive and Mental Disorders Division
- The need for a statewide task force to work on improving long-term follow along services for persons with mental disabilities

### D. Who have been served through other components of the statewide workforce development system; and

Currently these efforts have been focused at the local level. VRBS staff are members of the local community management teams (CMTs). As members of these teams, VRBS staff offer consultation and technical assistance on disability issues as needed. Also, most of the enrolled CRPs are active members of the CMTs.

One need that VRBS provides the system is information on Social Security Work Incentives when the workforce development system has consumers receiving Social Security benefits.

Through the planning process for developing the WIOA state plan more strategies in this area will be developed.

### E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

While assessing the needs of youth and students with disabilities, particularly in the Pre- Employment Transition Services (Pre-ETS) area has been occurring to some degree. The new priority for this to be an area of assessment is new and comprehensive need assessment methods are still to be developed.

However, the following needs are very apparent with what information has been gathered.

- Montana has a very unique school funding structure compared to other states. In Montana, most students with disabilities graduate at age either 18 or 19. There are very few school districts that serve students to age 21. Therefore, in Montana there is a need for developing a service structure outside the schools for youth with the most significant disabilities ages 19-21. In other states these are being provided in the schools for that age range. Unfortunately, Pre-ETS funding cannot be used for these services in Montana because the students are no longer in school.

- Further development and refinement of the Pre-ETS program is a very high need. Most of the mechanisms for delivering these services were developed rapidly and full implementation and refinement is going to be an ongoing process over the next few years. However, VRBS has developed new strategies to address the challenges of providing services to students with disabilities who are spread out over a large geographic area and continues to refine these strategies presently.
- VRBS is working with OPI to leverage some of that agency's data tools in order to work with all schools in the state in a more comprehensive manner that does not rely upon individual relationships and contacts. This work continues presently.

## 2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

Supported employment services are the primary emphasis of the VRBS and CRP relationship and were the focus of the needs assessment.

Issues identified to improve supported employment services include:

1. Expansion of services to rural and remote areas by the continued certification of private providers who meet VRBS' qualification levels for job assistance and supported employment services
2. Expansion of mental health providers as CRP's to serve those with severe and persistent mental illness
3. Planning for the needs of consumers requiring higher level of long-term supports was identified through participation with the Supported Employment Leadership Network (the employment first network of Montana).

## 3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act

As mentioned previously the development and refinement of a comprehensive Pre-ETS delivery system is the greatest need for addressing these issues.

The main focus of the Pre-ETS system is contracts with individual school districts to carry out an individualized Pre-ETS work plan to meet the needs of the local area. Therefore, most Pre-ETS are going to be an integral part of the school's delivery of services provided under the Individuals with Disabilities Act.

It should be noted that the contracts with school districts clearly define the population of Pre-ETS is all students potentially eligible for VRBS services not just those served through the Individuals with Disabilities Act.

## k. Annual Estimates

Describe:

### 1. The number of individuals in the State who are eligible for services

According to data provided by the 2017 American Fact Finder, the latest data available, there are approximately 70,309 people with disabilities who are between the ages of 18 and 64 years of age residing in Montana.

## 2. The number of eligible individuals who will receive services under:

### A. The VR Program;

- In FFY20 VRBS anticipates serving 2,000 participants at a case cost of \$5.8 million using Title I funding, with 230 individuals becoming employed.
- In FFY21 VRBS anticipates serving 2,500 participants at a case cost of \$7.3 million using Title 1 funding, with 280 individuals becoming employed.

### B. The Supported Employment Program; and

- Our program also anticipates that a total of 200 consumers will receive Title VI-B Supported Employment services at an overall case cost of around \$300,000 with an estimated 30 consumers employed in FFY20.
- For FFY2021 our program anticipates that a total of 200 consumers will receive Title VI-B Supported Employment services at an overall case cost of around \$300,000 with an estimated 30 consumers employed in FFY21.

### C. Each priority category, if under an order of selection.

The following table depicts how, for Federal Fiscal Year (FFY) 2020, VRBS estimates the number of individuals that will receive services under each Priority Category.

	<b>Title I or VI</b>	<b>Estimated Funds</b>	<b>Estimated Number to be Served in FFY20</b>	<b>Average estimated cost of services per case in FFY20</b>
<b>Priority Category 1</b>	Title I	\$4,680,000	1560	\$3000
<b>Priority Category 2</b>	Title I	\$997,500	380	\$2625
<b>Priority Category 3</b>	Title I	\$128,580	60	\$2143
<b>Totals (Title 1)</b>		\$5,806,080	2000	
<b>Priority Category 1</b>	Title VI	\$300,000	200	\$1500

The following table depicts how, for Federal Fiscal Year (FFY) 2021, VRBS estimates the number of individuals that will receive services under each Priority Category.

	<b>Title I or VI</b>	<b>Estimated Funds</b>	<b>Estimated Number to be Served in FFY21</b>	<b>Average estimated cost of services per case in FFY21</b>
<b>Priority Category 1</b>	Title I	\$6,330,000	2110	\$3000
<b>Priority Category 2</b>	Title I	\$918,750	350	\$2625
<b>Priority Category 3</b>	Title I	\$85,720	40	\$2143
<b>Totals (Title 1)</b>		\$7,334,470	2500	
<b>Priority Category 1</b>	Title VI	\$300,000	200	\$1500

3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

It is estimated that at the end of FFY 2020, 3000 individuals will be eligible for VR services, but will be on the waiting list for services because of order of selection.

It is estimated that at the end of FFY 2021, 2500 individuals will be eligible for VR services, but will be on the waiting list for services because of order of selection.

4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

This information for FFY 2020 and FFY2021 can be found in the table in Section k. 2. c

## I. State Goals and Priorities

The designated State unit must:

1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

VRBS and the State Rehabilitation Council (SRC) have developed the goals and priorities, which are listed below., VRBS and the SRC review the progress on the goals regularly.

## 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs

Goal: Modernize the VRBS service delivery system to be consistent with WIOA requirements.

Priority 1:VRBS will be a leader in services to youth with disabilities across the state of Montana, primarily through providing a strong base of Pre-Employment Transition Services (Pre-ETS) for Montana students with disabilities.

Priority 2:Increase alignment with WIOA partners, with an emphasis on developing and enhancing services for employers. Note: Beginning with the 2017 2nd Qtr. The priority language changed from services to employers to services to businesses. The language change reflects how businesses see and refer to themselves.

Priority 3: Build and maintain the capacity necessary to provide persons with disabilities employed in sub-minimum/segregated wage jobs opportunities to choose and achieve competitive, integrated employment. (Section 511 of WIOA).This includes building and maintaining the capacity of the Supported Employment program to provide services to these individuals exiting subminimum/segregated settings.

## 3. Ensure that the goals and priorities are based on an analysis of the following areas:

### A. The most recent comprehensive statewide assessment, including any updates;

VRBS and the SRC meet regularly to look at the results of the statewide needs assessment, and the discussions were used in the state plan.

### B. The State's performance under the performance accountability measures of section 116 of WIOA; and

VRBS management staff, SRC, the Statewide Independent Living Council, and the Client Assistance Program representative met to discuss the draft of the strategic plan and make final recommendations.

This review included a review of the standards and indicators and yearly performance related to the standards and indicators.

### C. Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

As of February 1, 2020, VRBS has not received its written monitoring report from the RSA on-site monitoring that occurred in 2019. The informal recommendations given to VRBS from the on-site RSA monitoring were presented to the council over the course of meetings preceding the



development of the strategic plan and were considered by the council when providing input to the state plan. Not all of the challenges discovered during monitoring have been addressed, and planning is ongoing.

## m. Order of Selection

Describe:

### 1. Whether the designated State unit will implement and order of selection. If so, describe:

#### A. The order to be followed in selecting eligible individuals to be provided VR services

VRBS has established the following three priority categories under order of selection:

**Priority Category One** - Most Significantly Disabled (MSD): Eligible individuals with serious functional limitations in three or more functional capacities, and who will require multiple services over an extended period of time.

**SD Priority Category Two:** Eligible individual(s) with serious functional limitations in one or more functional capacities, and who will require multiple services over an extended period of time.

- **OR** - The individual is a recipient of Social Security Disability Benefits (SSDI) or Supplemental Security Income (SSI) as a result of disability or blindness.

**NSD Priority Category Three:** All other eligible individuals with disabilities.

#### B. The justification for the order

Since Montana's Vocational Rehabilitation and Blind Services program (VRBS) does not believe it will be able to serve all eligible individuals with the available resources, it has implemented an order of selection.

VRBS first entered into order of selection in March of 2014 when it closed Category 3 and was able to be out of the order of selection for a period of time before reopening category 3. However, it was necessary to Close Category 3 again in October 2015. Category 2 was closed in July 2016. Category 1 was closed in March of 2017. All categories are currently closed. All of the category closures were made because VRBS believed that it could not serve all eligible individuals with the available financial and/or personal service resources. This belief remains in place as well for Federal Fiscal Year (FFY) 2020.

The following paragraphs below present our justification by describing the factors that impact our belief that remaining in an order of selection is necessary.

The Workforce Innovation and Opportunity Act (WIOA) requires a 15 percent reserve for pre-employment transition services. As such, VRBS anticipates the required service to students with disabilities who are eligible or potentially eligible for services will necessitate VRBS to focus its efforts to provide services to local school districts. These efforts, both in terms of financial and staff resources, will be above and beyond the services that were historically provided solely through case services in years past.

Specifically, according to the Montana Office of Public Instruction's data, the State of Montana has 413 public school districts which contain 171 high schools. In order to create the necessary infrastructure to provide Pre-Employment Transition Services, which previously has not existed prior to WIOA, members of the VRBS field staff travel to varying high schools or district offices to meet with school personnel, many of whom are located in rural environments. We anticipate that this will result in a higher backlog of traditional case services.

Additionally, the trend of the availability of re-allotment Title I funds nationally may indicate that additional federal funds might not be available in the full amount requested by the state even if the non-federal matching funds are sufficient and available. This assumption is based on the national data provided by RSA when comparing year-over-year the net amount relinquished versus requested in aggregate for all grant recipients through FFY 2020's re-allotment period. This is another indicator to VRBS that remaining in an order of selection status is merited.

We also are anticipating the Maintenance of Effort penalty to be assessed for our FFY2020 award and our FFY2022 award which decreases our ability to serve all eligible individuals.

VRBS anticipates having all categories remaining closed through fiscal year 2020.

## C. The service and outcome goals

The time frames for achieving these goals by priority category are depicted in the table below:

Priority Category	Number of Individuals to be served	Estimated number of individuals who will exit with employment after services	Estimated number of individuals who will exit without employment after services	Time within which goals are to be achieved
1	1530	320	400	Immediately to two years
2	450	130	200	Immediately to two years
3	70	25	30	Immediately to two years

## D. Time within which these goals may be achieved for individuals in each priority category within the order; and

This information is provided in the previous section.

## E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities

Those individuals in Priority Category One will have the highest priority and will be served first, followed by individuals in Priority Category Two, and finally by those individuals in Priority Category Three. All individuals within a higher priority category will be served before any individual in the next lowest priority category.

Regardless of which category closure scenario is in effect, eligible individuals will be released from the statewide waiting list first by priority category, most significant to least significant; and then by order of application date, oldest to newest.

Since August 2018 to February 2020, VRBS has invited 373 consumers from the Priority Category One waiting list to develop an Individual Plan for Employment (IPE) the vast majority of which, 223, have occurred since October 1, 2019. A total of 165 new IPEs have been developed and 34 consumers are currently in the IPE development phase.

## 2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection,

## who require specific services or equipment to maintain employment

The DSU chose to serve eligible individuals, regardless of any established order of selection, who required specific services or equipment to maintain employment through December 31, 2017.

Effective January 1, 2018 the DSU stopped waiving the established order of selection for individuals who required specific services or equipment to maintain employment.

## n. Goals and Plans for Distribution of title VI Funds

### 1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services

The goal of the state's supported employment program is to maintain a system whereby individuals with the most significant disabilities are afforded the opportunity to participate in competitive integrated employment.

Supported employment services are provided on a statewide basis through the Title VI, Part B funds. Individuals eligible for supported employment are those individuals with the most significant disabilities for whom competitive integrated employment has not historically occurred, or for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability, and who, because of the nature and severity of their disabilities, has had supported employment identified as the appropriate employment service followed by long term supports after the VR case is closed. Fund allocation on a statewide basis ensures an equitable statewide service delivery.

Vocational Rehabilitation and Blind Services (VRBS) will continue to encumber Title VI, Part B funds on a fee-for service basis. When supported employment services exhaust Title VI, Part B funds, then Title I funds will be utilized to provide needed supported employment services. At this time and in recent years, this procedure has made it possible to provide all planned supported employment services for individuals receiving VRBS services. If in the future VRBS determines that there are inadequate funds to provide all needed supported employment services for individuals on the VRBS caseload then supported employment will be funded with Title I dollars.

In addition, VRBS prioritizes the use of supported employment models that maximize integration of persons with the most significant disabilities in real work sites, doing meaningful work. VRBS does not support the use of segregated bench work, sheltered, enclave or segregated crew models. VRBS has been aware of and used customized employment techniques for some time, however with the passage of WIOA, VRBS plans to emphasize these techniques to a greater degree.

### 2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

#### A. The provision of extended services for a period not to exceed 4 years; and

Section 603(d) of the *Rehabilitation Act* requires a State to reserve half (50 percent) of its allotment for the provision of SE services, including extended services, to youth with the most significant disabilities. VRBS has met this requirement in years past and plans to continue to meet this requirement. Once employment is obtained, VRBS funds the employment supports for youth with the

most significant disabilities with the funds reserved pursuant to section 603(d) for 90 days minimum. Then the counselors may fund these supports longer (up to 4 years) while the counselor simultaneously is pursuing the availability of other long-term funding for the employment supports. VRBS does not discontinue funding for the youth's extended services until other funding is secured. VRBS maintains an accounting structure to track these expenditures as well as written procedure and internal controls to monitor the period of time in which VRBS is funding these supports under the service category Extended Services so as not to exceed 4 years.

## **B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.**

VRBS has identified the following sources of funding for long-term on-the-job support services. Each funding source has a different group of providers for the services, but most of the extended services providers are CRPs enrolled with VRBS:

- A. Extended Employment Services – State General Fund
- B. Mental Health cooperative agreement
- C. Developmental Disabilities cooperative agreement
- D. Private pay to CRP (CRP is signoff)
- E. Natural supports
- F. Medicaid waiver program
- G. Utilize employment work expenses as an option for Social Security recipients.

## **o. State's Strategies**

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

### **1. The methods to be used to expand and improve services to individuals with disabilities**

The comprehensive needs assessment is the primary process for identifying areas related to innovation. Activities supported specifically by innovation and expansion funds include the consumer satisfaction survey and meetings for the State Rehabilitation Council (SRC) and the Statewide Independent Living Council.

Other activities related to expanding services are detailed in below in activities to achieve goals and priorities.

### **2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis**

VRBS works closely with MonTECH (the Montana State operator for the state grant AT program) who has two offices located on the two halves of the state (one in Missoula and one in Billings). MonTECH is also available to demonstrate equipment and assess technology needs through the use of video conferencing. VRBS hopes to assist with expansion of these efforts through

expanding the computer communication technology available in VRBS offices. Each VRBS office has been provided with a variety of assistive technology items that are commonly used by persons with disabilities. MonTECH will be able to assist with the demonstrations of this equipment through the video conferencing systems.

Each BLVS regional office has a rehabilitation teacher who has background in technology related to blind and low vision and each regional office has some demonstration equipment available for consumers to test equipment before purchase. MonTECH provides additional demonstration equipment to the three BLVS offices outside of Missoula or Billings.

### 3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program

American Indians represent the significant minority group in Montana (6.5% of the population). Montana has seven reservations and some of the reservations are home to more than one tribe. Each reservation has an autonomous governing body. In addition, the Little Shell Chippewa Tribe was recently granted Federal recognition but has no reservation. VRBS has counselors who serve consumers on each reservation. These counselors coordinate with Section 121 project staff to identify potential referrals and resources. American Indians with disabilities living on reservations face unique challenges.

- First, they are eligible for a combination of tribal, federal, and state programs to meet their vocational and health needs. This requires extensive coordination and cooperation between agencies.
- Secondly, they are faced with significant cultural and economic barriers. Unemployment on these reservations varies from 4.7% to 11.7%, while Montana's statewide unemployment rate is 3.7% (Montana Department of Labor and Industry website). Today there are very few private or self-employment opportunities on reservations; most employment comes through tribal and federal programs.

Six Section 121 vocational rehabilitation projects (Confederated Salish & Kootenai, Blackfeet, Chippewa Cree, Assiniboine Sioux, Fort Belknap, and Chief Dull Knife College) are located in Montana. This gives improved access to vocational rehabilitation services for American Indians with disabilities residing on or near reservations served by the projects. Section 121 projects have a better grasp of the cultural and service delivery barriers that exist on reservations and can help support VRBS counselors as needed.

VRBS' counselors assigned to these six reservations coordinate with each project staff as needed. In addition, the VRBS program manager visits each 121 project annually and provides technical assistance when requested.

In some cases, VRBS has access to specialized programs, or services, which are not always found on reservations. VRBS works to network, coordinate, offer technical assistance, and provide training opportunities for Section 121 project staff to ensure consumers with disabilities have access to the full range of vocational rehabilitation services. Cooperative agreements have been completed with each of the Section 121 projects and are monitored on an annual basis by the program manager.

In order to ensure that VRBS is meeting the needs of American Indians that do not live on or near the reservation, VRBS staff meet with: Missoula Native American Center, Helena Indian Alliance, Great Falls Indian Family Health Center, Butte - North American Indian Alliance, and the Indian Health Board of Billings. VRBS provides program referral information regarding VRBS and the transitions services for youth.

## **Identification of Outreach Procedures Used to Identify and Serve Individuals with Disabilities who have been Unserved or Underserved by VRB**

For several years VRBS has considered Native Americans as the unserved/underserved population of the state. In addition, VRBS conducted an assessment of case work data to determine other potential unserved/underserved populations and will be developing outreach strategies for the groups identified.

### **4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services)**

The primary method of improving and expanding VR services to students with disabilities has been described elsewhere in this document. The main method has been contracting for Pre-ETS services with school districts. There also have been additional contracts with programs like Montana Youth Transitions, Montana Youth Leadership Forum, Moving On, Project Search, Montana Center for Inclusive Education's Virtual college peer mentoring program, and exploring specialized Pre-ETS collaboration with the tribal VR programs located in Montana.

In addition, VRBS counselors have been encouraged to take applications with students with disabilities at a younger age and provide IPE services that are focused on vocational and career exploration rather than a specific vocational goal.

### **5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State**

VRBS continually assesses the need to establish, develop and improve community rehabilitation programs through town hall meetings, break-out listening session at the Montana Association for Rehabilitation Conference, annual stakeholder meetings with CRPs, and ongoing informal communication. The need areas being addressed at this time include:

Expansion of services to rural and remote areas by the continued certification of private providers who meet VRBS qualification levels for job placement and job coaching services

Expansion of mental health providers as CRP's to serve those with severe and persistent mental illness

In the past years, through the collaboration with multiple agencies, CRPs, and consumers, many initiatives are under consideration that will increase the number of persons with significant intellectual disabilities to be placed in competitive community employment. A significant number of the initiatives under consideration include assisting CRP services to be prepared to serve this population. One initiative that has been started is to develop web-based training for vocational services staff of CRPs that is required by VRBS called Invest. This training was used with success from 2014-2016 but was discontinued by the providers of the training. VRBS is researching and seeking out additional training that could be used to train and update CRPs and their staff.

In addition, VRBS has been actively engaged with Marc Gold and Associates to provide training to our CRPs on Customized Employment. Gateway trainings in Discovery were held in Missoula in the summer of 2017 and in Billings during the fall of 2018 leading to the establishment of 7 Discovery Certified providers across the state of Montana. The DSU plans to provide a Gateway Training on Customized Job Placement in Missoula during the spring of 2020 for all previously Discovery Certified providers in the state.

CRPs that are providing Pre-Employment Transition Services have been referred to the Workforce Innovation Technical Assistance Center (WINTAC) site to view the webinar on collaborative partnerships and strategies for CRPs on Pre-ETS. They have also been provided with the CRP Guidebook from WINTAC. The WINTAC website shares information on the current transition environment and how it is creating opportunities for students with disabilities and those that support their success.

## 6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA

Many of the strategies developed to meet the goals established by the comprehensive needs assessments are aimed at improving the long range outcomes of persons exiting VR. Those strategies are detailed below in the section on activities to achieve goals and objectives.

Also, VRBS and the SRC will continue to monitor the performance outcomes throughout the year to assure compliance in meeting the required indicators.

## 7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities

As a core partner, VR will be aligned with the workforce system through:

- Representation on the state and local boards.
- Collaborative case management and co-enrollment when needed by the services from more than one system partner. Partners will make referrals to initiate co-enrollment if/when the consumer could benefit from the services of another partner program, if the consumer agrees, and/or if the consumer so requests. Referrals will be made on an individual consumer by-consumer basis, and not as a blanket referral throughout the workforce system.
- Co-enrollment occurs when consumers are actively participating in
- Collaboration with other core partners on targeted outreach activities.
- Enhanced consumer referrals among core partners.
- Participation in evaluation and continuous improvement strategies.
- Specific strategies to strengthen communications among core partners.
- Collaboration among core partners for business outreach activities.

## 8. How the agency's strategies will be used to:

### A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

The management staff of VRBS meet regularly with representatives of the SRC to discuss comprehensive needs and priorities for the upcoming year. The group looked at formal input from public hearings, focus forums, VRBS staff, consumer satisfaction survey, Client Assistance Program, SRC, state and national sources (CSAVR, RSA policy changes, legislative activities, umbrella agency activities), and other surveys. Information from this meeting is used to plan for the next three years and for the legislature. VRBS and the SRC have developed the goals, objectives, and strategies.

For the strategic plan, the format of strategies was changed. In past plans, strategies were connected to specific priorities or objectives. In reviewing this plan's strategies, it was determined that several strategies applied to multiple priorities. Therefore, the strategies will not be listed with specific priorities. Rather, the priorities will be listed numerically and then after the strategy, the priorities that are expected to be impacted will be listed.

## VRBS' STRATEGIC PLAN

**Goal: Modernize the VRBS service delivery system to be consistent with WIOA requirements.**

### Priority 1:

**VRBS will be a leader in services to youth with disabilities across the state of Montana, primarily through providing a strong base of pre-employment transition services (Pre-ETS) for Montana students with disabilities.**

Strategies for achieving Priority 1:

1.A. Increase the number of school district Pre-ETS contracts completed annually for the next three years.

1.B. Increase and expand specialized programs, such as Montana Youth Leadership Forum and Movin' On Montana, that offer Pre-ETS services outside of the schools annually over the next three years.

1.C. Increase the amount of time counselors spend on interaction with students with disabilities, expand the types of activities involving counselor/student interactions.

1.D. Expand Pre-ETS contracts with schools on or near reservations and schools serving youth in treatment and detention facilities annually for next three years.

1.E. Develop and expand annually Pre-ETS services for American Indian students not residing on a reservation. These services will focus on transition issues unique to this population.

### Priority 2:

**Increase alignment with WIOA partners, with an emphasis on developing and enhancing services for employers. Note: Beginning with the 2017 2<sup>nd</sup> Qtr. The priority language changed from services to employers to services to businesses. The language change reflects how businesses see and refer to themselves.**

Strategies for achieving Priority 2:

2. A. Increase employers' awareness of the untapped pool of talented workers with disabilities seeking employment throughout Montana.

2. B. Provide consultation, training and resources to WIOA partners and employers to dispel the stereotypes of disability and focus on the strengths, abilities and unique perspectives people with disabilities bring to the workforce.

2. C. Increasing employment of people with disabilities in state government by working with WIOA partners to implement practices of the National Governor's Association Chair initiative; "A Better Bottom Line: Employing People with Disabilities".

2. D. Work with WIOA partners to increase partnerships with businesses to develop or expand work experience, internship, apprenticeship and other job entry programs for Montanans with disabilities. This will include Montana Workforce specific programs such as RevUp and HealthCARE Montana.

2. E. Ensure VRBS consumers who can benefit from services offered by WIOA partners are made aware of the services and can access the services through a consumer-friendly process, such increased use of the Montana Career Information System (MCIS).



VRBS provided guidance to staff on using MCIS as an entry step to the VRBS program for PreETS consumers.

2. F. Increase VRBS counselors' knowledge of labor market trends and "in-demand" jobs to assist VR consumers in career selection and training options that meet the needs of a job-driven economy and increase their employment options.

### **Priority 3**

**Build and maintain the capacity necessary to provide persons with disabilities employed in sub-minimum/segregated wage jobs opportunities to choose and achieve competitive, integrated employment. (Section 511 of WIOA).**

Strategies for achieving Priority 3:

3 A. Train VRBS staff in the procedures necessary to comply with Section 511 of WIOA.

3 B. Provide guidance to 14 (c) sub minimum wage employers on the procedures to comply with Section 511 of WIOA.

3 C. Provide guidance to school personnel on procedures and documentation necessary to comply with Section 511 of WIOA.

3. D. To facilitate informed choice, VRBS will contract with Montana's Centers for Independent Living to provide information and career counseling services about competitive, integrated employment options every six months during the year following the July activation of Section 511 or an individual's first year of sub-minimum wage employment and annually thereafter.

3. E. For individuals working for a 14 (c) employer who choose to pursue competitive, integrated employment, VRBS will build and maintain the capacity to provide comprehensive VR services, including evidence-based services, for this expanded caseload.

3. F. VRBS will develop or revise old agreements with the Developmental Services Division (DSD), Addictive and Mental Health Disorders Division (AMDD), Medicaid, Senior and Long-Term Care Division (SLTC) and the Office of Public Instruction (OPI) to document the alignment with VRBS involving meeting requirements of WIOA.

### **B. Support innovation and expansion activities; and**

Activities supported specifically by innovation and expansion funds include the consumer satisfaction survey and meetings for the State Rehabilitation Council (SRC) and the Statewide Independent Living Council.

### **C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.**

Northeastern Montana is a very expansive, but thinly populated area. With the new emphasis on serving youth in high school the one office (two counselors) that covers the area had 30 high schools to cover, with only 1 high school in the town the office was located and the other 29 high schools involving commutes of up to 303 miles one way. The strategy to solve this was to move a counselor position from another office to the Northeastern Montana office.

All Montana offices have rural areas to cover and attending IEP meetings was difficult throughout the state and now counselors are working with schools to attend the meetings by teleconferencing.

It is very difficult for Montana to add new positions in a state agency. Therefore, with the new requirement for comprehensive Pre-ETS services statewide the strategy of contracting with school districts was developed.

When an enrolled CRP is not available to provide supported employment services in a remote area, VRBS contracts with a local person with appropriate skills such as retired teachers and human service professionals to provide the service in the local area.

## p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals

The following is the complete evaluation report and within the report there are strategies identified that contributed to achievement of various priorities.

**Goal: Modernize the VRBS service delivery system to be consistent with WIOA requirements.**

### **Priority 1:**

**VRBS will be a leader in services to youth with disabilities across the state of Montana, primarily through providing a strong base of pre-employment transition services (Pre-ETS) for Montana students with disabilities.**

Strategies for achieving Priority 1:

1.A. Increase the number of school district Pre-ETS contracts completed annually for the next three years.

**Progress Update:** Due to budget constraints, VRBS stopped entering into contracts with schools in the spring of 2017. The number of schools completing contracts in PY2017 was 89. VRBS was able to resume entering into contracts with schools again in 2018, but the requirements changed significantly. The fee schedule has changed and students are now asked to provide their social security number along with information about specific Pre-ETS they are requesting. The increased requirements and accountability have resulted in fewer schools contracting with VRBS since 2017. The number of school district contracts in PY2017, PY2018 and PY2019 has remained steady at 35-40 Pre-ETS contracts completed per year.

1.B. Increase and expand specialized programs, such as Montana Youth Leadership Forum and Movin' On Montana, that offer Pre-ETS services outside of the schools annually over the next three years.

**Progress Update:** VRBS has been providing funding for Movin' On Montana college experience programs at both the University of Montana (U of M) and Montana State University-Billings (MSU-B). The U of M will not offer Movin' On in PY2019, but MSU-B will offer an expanded program. The Montana Youth Leadership Forum (MYLF) has expanded to include follow-along services as well as step 2 for youth who completed the original forum and "mini's" for students who want to participate in a condensed version of the original MYLF. MYTransitions continues to offer a Transition Conference that is always very well attended.

1.C. Increase the amount of time counselors spend on interaction with students with disabilities, expand the types of activities involving counselor/student interactions.

**Progress Update:** Counselors have received extensive training on working with students with disabilities. The Workforce Innovation Technical Assistance Center (WINTAC) spent an afternoon with VRBS staff providing training on Pre-ETS modules and resources that can be used with students with disabilities. They also received specific training on work-based learning experiences. The agency now has a Pre-ETS Bureau which will include Pre-ETS Specialists who will devote all of their time to working with students with disabilities.

**Priority 2:**

**Increase alignment with WIOA partners, with an emphasis on developing and enhancing services for employers. Note: Beginning with the 2017 2<sup>nd</sup> Qtr. The priority language changed from services to employers to services to businesses. The language change reflects how businesses see and refer to themselves.**

Strategies for achieving Priority 2:

2. A. Increase employers' awareness of the untapped pool of talented workers with disabilities seeking employment throughout Montana.

**Progress Update:** In 2019 the VRBS Business Services Team made contact with 158 Montana businesses regarding VRBS services and individuals ready to work.

2. B. Provide consultation, training and resources to WIOA partners and employers to dispel the stereotypes of disability and focus on the strengths, abilities and unique perspectives people with disabilities bring to the workforce.

**Progress Update:** Members of the Business Services Team are trained in the Windmills curriculum, a disability awareness training and interactive experience. The team has provided this training to the State Rehabilitation Council, Job Service Employer Committees, local community rehabilitation programs and the Disability Determination Service.

2. C. Increasing employment of people with disabilities in state government by working with WIOA partners to implement practices of the National Governor's Association Chair initiative; "A Better Bottom Line: Employing People with Disabilities".

**Progress Update:** The Business Team Lead Specialist meets monthly with the Bureau Chief of the Workforce Services Division to discuss employment of persons with disabilities in State government.

2. D. Work with WIOA partners to increase partnerships with businesses to develop or expand work experience, internship, apprenticeship and other job entry programs for Montanans with disabilities. This will include Montana Workforce specific programs such as RevUp and HealthCARE Montana.

**Progress Update:** Business Team members regularly attend local Community Management Team, Job Service Employer Committee, and Chamber of Commerce meetings to network regarding internships and work experiences for persons with disabilities. A Team member in Missoula recently assisted with the completion of a Memorandum of Understanding with a local employer to create a staffing referral process.

2. E. Ensure VRBS consumers who can benefit from services offered by WIOA partners are made aware of the services and can access the services through a consumer-friendly process, such increased use of the Montana Career Information System (MCIS).

**Progress Update:** With the closure of all Categories for VRBS services, consumers placed on a waiting list are provided with a resource list of local WIOA partners that may offer services to support their career choices.

2. F. Increase VRBS counselors' knowledge of labor market trends and "in-demand" jobs to assist VR consumers in career selection and training options that meet the needs of a job-driven economy and increase their employment options.

**Progress Update:** The VRBS Business Services Team publishes a monthly newsletter that contains labor market information, trends in employment, industry spotlights, articles regarding State and National employment data and links to recruiting sites.

### **Priority 3:**

**Build and maintain the capacity necessary to provide persons with disabilities employed in sub-minimum/segregated wage jobs opportunities to choose and achieve competitive, integrated employment. (Section 511 of WIOA).**

Strategies for achieving Priority 3:

3 A. Train VRBS staff in the procedures necessary to comply with Section 511 of WIOA.

**Progress Update:** A PowerPoint presentation of Career Counseling and Information and Referral (CCIR) was developed and staff were trained on how to present the information.

3 B. Provide guidance to 14 (c) sub minimum wage employers on the procedures to comply with Section 511 of WIOA.

**Progress Update:** Technical assistance was provided to the sub minimum wage employers via letters, verbal guidance, and on-site consultation.

3 C. Provide guidance to school personnel on procedures and documentation necessary to comply with Section 511 of WIOA.

**Progress Update:** Pre-ETS Bureau Chief developed a 511 Procedure Guide for VR staff and school personnel that addressed the appropriate use of sub-minimum wage employment for students exiting high school.

3. D. To facilitate informed choice, VRBS will contract with Montana's Centers for Independent Living to provide information and career counseling services about competitive, integrated employment options every six months during the year following the July activation of Section 511 or an individual's first year of sub-minimum wage employment and annually thereafter.

**Progress Update:** VRBS contracted with Montana's Centers for Independent Living to provide CCIR services. This proved to be effective and the program is considering re-contracting with the Centers for Independent Living again in PY2019.

3. E. For individuals working for a 14 (c) employer who choose to pursue competitive, integrated employment, VRBS will build and maintain the capacity to provide comprehensive VR services, including evidence-based services, for this expanded caseload.

**Progress Update:** VRBS has piloted Discovery and Customized Employment Services in 2017 and 2018 and has developed procedures and fee schedules to improve capacity in the knowledge and skills to serve this expanded population. As well, VRBS has a scheduled Gateway Training on Customized Job Placement to be facilitated by Marc Gold and Associates and provided in spring of 2020.

3. F. VRBS will develop or revise old agreements with the Developmental Services Division (DSD), Addictive and Mental Health Disorders Division (AMDD), Medicaid, Senior and Long-Term Care Division (SLTC) and the Office of Public Instruction (OPI) to document the alignment with VRBS involving meeting requirements of WIOA.

**Progress Update:** An analysis of the existing agreements between DSD, AMDD, Medicaid, and SLTC is currently in progress. The DSU's agreement with OPI has been updated and is reflective of current alignment with WIOA and has been RSA approved.

**B. Describe the factors that impeded the achievement of the goals and priorities**

**Goal: Modernize the VRBS service delivery system to be consistent with WIOA requirements.**

**Priority 1:**

**VRBS will be a leader in services to youth with disabilities across the state of Montana, primarily through providing a strong base of pre-employment transition services (Pre-ETS) for Montana students with disabilities.**

Strategies for achieving Priority 1:

1.A. Increase the number of school district Pre-ETS contracts completed annually for the next three years.

**Progress Update:** Due to budget constraints, VRBS stopped entering into contracts with schools in the spring of 2017. The number of schools completing contracts in PY2017 was 89. VRBS was able to resume entering into contracts with schools again in 2018, but the requirements changed significantly. The fee schedule has changed and students are now asked to provide their social security number along with information about specific Pre-ETS they are requesting. The increased requirements and accountability have resulted in fewer schools contracting with VRBS since 2017. The number of school district contracts in PY2017, PY2018 and PY2019 has remained steady at 35-40 Pre-ETS contracts completed per year.

**2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:**

**A. Identify the strategies that contributed to the achievement of the goals**

VRBS continually assesses the need to establish, develop and improve CRPs. Among the need areas being addressed at this time are:

- Expansion of services to rural and remote areas by the continued enrollment of private providers who meet VRBS qualification levels for job placement and job coaching services. New providers are being developed in the northern Montana and in other remote areas of the state. Increasing the number of counselors serving the north east section of the state has been a strategy that contributed to improvement in this area.
- Expansion of mental health providers as CRPs to serve those with severe and persistent mental illness VRBS continues to work on this issue, but there has been no new providers added in the last year. VRBS is working with an initiative of the Addictive and Mental Disorders Division to improve employment of persons with significant mental health disabilities. Some of the providers that the Addictive and Mental Disorders Division are developing as part of this initiative may become VRBS enrolled CRPs in the future. The project coordinator was a past IL program manager of this initiative was a past IL program manager and her understanding of VR contributed to this initiative working well with VR.
- VRBS in collaboration with the Developmental Disabilities Program developed an on-line training to be required of all providers (Invest). This provides a core set of information and techniques for all providers in the state. The collaboration and communication by being involved in the Supported Employment Leadership Network was a strategy that contributed to success of this activity.

**B. Describe the factors that impeded the achievement of the goals and priorities**

The primary factor that impedes success in the priorities mentioned above is the rural nature of Montana. Large areas with small populations make it difficult to develop supported employment resources.

### 3. The VR program's performance on the performance accountability indicators under section 116 of WIOA

The following is PY2018 data for the performance accountability indicators taken from the WIOA Statewide and Local Performance Report for the VR program.

- Program Year 2018 data is:
  - Employment rate 2<sup>nd</sup> quarter after exit: 28.5%
  - Employment rate 4<sup>th</sup> quarter after exit: not available
  - Median Wage 2<sup>nd</sup> qtr. after exit: \$3275
  - Credential Rate not available
  - Measurable Skill Gains 42.9%
  - Effectiveness in Serving Employers: not available

This information is baseline and actual performance levels will be set when further guidance is received.

In the past, each core program has collected data according to its respective needs, leading to gaps in the prior data available to inform the new performance measure targets. When possible, WIA data was used to fill in the gaps. Proposed performance measures were adjusted downwards to reflect the worker shortage in the current labor market. However, existing data does not allow calculation of measurable skill gains and credential attainment rates for each core program. While the programs will adjust to capture new data, preliminary estimates for those measures were made without support from historic data. The rates are baseline best-guess estimates and will likely change as more guidance is received.

Without any precedent for gauging the effectiveness of employer services, Montana will use employment retention for the Effectiveness in Serving Employers measure (retention of employment 4 quarters after program exit). This measure is being used by all the other partners involved with the Combined Plan and allows for comparison across programs. In the upcoming low-unemployment environment we will work with businesses seeking help with their hiring challenges by providing information and resources on sound hiring and retention practices and by educating them on the value of hiring populations previously not considered by Montana's businesses, including individuals with disabilities.

### 4. How the funds reserved for innovation and expansion (I&E) activities were utilized

- Support the Statewide Independent Living Council and the State Rehabilitation Council, which each meet four times during the year to conduct business. Expenditures included travel, stipends, supplies, meeting room rental, interpreters, and facilitation services.
- To pay some costs related to the consumer satisfaction survey.

### q. Quality, Scope, and Extent of Supported Employment Services

Include the following:

# 1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities

**Quality of Supported Employment** Vocational Rehabilitation and Blind Services (VRBS) enrolls providers who will provide supported employment time services. The enrollment process requires that providers have met a set of standards described in administrative rules. This enrollment process ensures that the providers maintain the necessary education, skills, and degree of professional expertise to provide a level of service commensurate with VRBS work service standard. VRBS values its priority partners who have met the required standards. Supported employment providers enrolled through the developmental disability system or mental health system represent the majority of our providers. The Commission on Accreditation of Rehabilitation Facilities (CARF) and Rehabilitation Services Accreditation System (RSAS) are also utilized by providers. Other providers are individuals or organizations who have been enrolled to provide services for a limited number of consumers in a rural area where there are no established providers.

Quality of services is continually monitored by the VR counselors as well as by the Program Manager who conducts reviews of the CRPs supported employment services.

## **Scope of Services**

The scope of services available may include one or more of the following services depending on the individual's needs:

- Supported Employment Services
- Extended Services

Extended support services are available through a variety of programs following closure of the VR case. These services are described previously in this document.

VRBS has recently updated policy to align with WIOA changes on youth and supported employment/extended services.

## **Extent of Supported Employment:**

An individual shall be eligible to receive supported employment services using Title VI Part B funds for those:

1. for whom competitive integrated employment has not historically occurred, or
2. for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability, and
3. who, because of the nature and severity of their disabilities, has had supported employment identified as the appropriate employment service followed by long term supports after the VR case is closed

## **Cooperative Agreements:**

When a goal requiring supported employment is identified in the IPE, a document (cooperative agreement) signed and dated by the extended service provider reflecting the commitment of extended service provisions will be placed in the file prior to closure. A similar commitment is obtained from the fund provider when appropriate.

# 2. The timing of transition to extended services

## **Funding Extended Support Services Prior to Closure:**

VRBS provides time-limited services needed to support an individual in employment (with the exception of extended services for youth with the most significant disabilities between the ages of 14-24 for which the time limit is 48 months). VRBS can fund a maximum of 24 months of job coaching and follow-along services unless the Individualized Plan of Employment (IPE) indicates that more than 24 months of services are necessary for the individual to achieve job stability prior to transitioning to extended support services. Prior to the purchase of supported employment services, the need for services, the appropriate extended support services, funding, and the appropriate agency to provide the services are established and identified on the IPE. Supported employment services are available statewide.

## Vocational Rehabilitation (Combined or General) Certifications

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];

Enter the name of designated State agency or designated State unit, as appropriate

Disability Employment and Transitions Division

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17], the Rehabilitation Act, and all applicable regulations[18], policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

Enter the name of designated State agency

Montana Department of Public Health and Human Services

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services,



the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19] , the Rehabilitation Act, and all applicable regulations[20] , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

Enter the name of authorized representative below

Chanda Hermanson

8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

Enter the title of authorized representative below

Division Administrator

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

## Footnotes

[14] Public Law 113-128.

[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

## Certification Signature

Signatory information	Enter Signatory information in this column
Name of Signatory	Chanda Hermanson
Title of Signatory	Administrator
Date Signed	03.02.2020

## Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining	

The State Plan must include	Include
to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	No
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	

The State Plan must include	Include
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	No
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	

The State Plan must include	Include
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

## Vocational Rehabilitation Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the

Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	43.0	n/a	44.0	n/a
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## VII. Program-Specific Requirements for Combined State Plan Partner Programs

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program—and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. <sup>24</sup> If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would

submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

## Trade Adjustment Assistance (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Yes

## Jobs for Veterans' State Grants

(OMB Control Number: 1225-0086)

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to States (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported quarterly on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

### a. How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

Veterans and eligible persons receive employment, training and job placement services at the Montana Job Service Centers like other Montana Job Service Center customers. However, veterans and eligible persons will receive priority of service over non-veterans when it comes to receiving employment, training, and job placement services.

DVOP and CP staff are all located in Montana Job Service Centers. All customers entering these locations will be screened for Veteran status and DVOP/CP eligibility.

DVOP and CP staff are expected to provide intensive case management services for SBE Veterans to include VR&E enrolled Veterans. This includes a comprehensive assessment and individual employment plan based upon the employment plan provided by the VA for the VR&E Veterans. The goal is to provide SBE and VR&E Veterans with the tools to be successful in the job search. DVOP and CP staff will work one on one with eligible Veterans and assist with Resume writing and review, interview concepts and skills and job searching techniques.

CP staff while performing LVER duties will promote to employers, employer associations, and business groups the advantages of hiring Veterans. CP staff will be included in the workforce connections center's Business Services Team, to advocate for all veterans served by the center with business, industry, and other community-based organizations by participating in appropriate activities such as



- o Planning and participating in job or career fairs;
- o Conducting employer outreach;
- o In conjunction with employers, conducting job searches and workshops, and establishing job search groups;
- o Coordinating with unions, apprenticeship programs and businesses or business organizations to promote and secure employment and training programs for veterans;
- o Informing Federal contractors of the process to recruit qualified veterans;
- o Promoting credentialing and licensing opportunities for veterans; and
- o Coordinating and participating with other business outreach efforts.

**b. The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;**

DVOPs are charged with providing case management and individualized careers services to young veterans aged 18-24, eligible spouses, and veterans with Significant Barriers to Employment (SBEs) as outlined in Veterans Program Letter most current guidance, which include:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); special disabled and disabled veterans are those who:
  - o are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or
  - o were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b)), as amended;
- A recently-separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3 (36).
- Veterans age 18-24.
- Vietnam Era Veteran is an eligible Veteran any part of whose active military, naval, or air service was during the Vietnam era from Feb 28, 1961 t May 7, 1975 for service in Vietnam or Aug 5, 1964 to May 7, 1975 for service outside of Vietnam.
- Eligible Transitioning Service Members, Spouses, and Caregivers.

DVOPs provide a range of services including career planning and counseling, comprehensive Outreach to locate veterans in need of intensive services;

- - Comprehensive Assessment, including a documented plan of service (IEP);
  - Counseling and career/vocational guidance;
  - Referral of veterans to supportive or remedial services;
  - Promoting Vocational Rehab and WIOA services;
  - Referral of veterans to job focused and outcome-driven training or certification;
  - Job development;
  - Development of VA funded Special Incentive and OJT;
  - Review all open case files of current participants with an SBE in a priority category and perform case management duties; and
  - Referral of veterans to employment opportunities.

CP should advocate for all Veterans served by the Job Service Centers with business, industry and other community-based organizations by participating in appropriate activities such as: career services within the Montana Job Service Centers. career services within the Montana Job Service Centers. These services include but are not limited to:

- - Planning and participation in job and career fairs meeting with employers.
  - Conducting employer outreach
  - In conjunction with employers, conducting job searches and workshops, and establishing search groups.
  - Coordinating with unions, apprenticeship programs and business organizations to promote and secure employment and training programs for Veterans.
  - Informing Federal contractors and sub-contractors of the process to recruit qualified Veterans.
  - Promoting credentialing and licensing opportunities for veterans.
  - Coordinating and participating with other business outreach efforts.

### **c. The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or American Job Center;**

Jobs for Veterans State Grant (JVSG) programs are administered by the Montana Department of Labor & Industry (DLI) and are co-located, fully integrated, and managed by the Montana Job Service Operations Bureau, which also serves as the state's One-Stop Operator. JVSG funds 6.5 FTE including:

- Disabled Veterans Outreach Specialists (DVOP);

- A Veteran Intensive Service Coordinator who also serves as the program manager; and
- A Combined Position that serves as a DVOP and Local Veterans Employment Representative (LVER).

Customers entering the Job Service Centers are screened for eligibility and referred to JVSG staff as appropriate. In most cases, JVSG clients are co-enrolled in Title I-B programs.

The CP performing LVER duties works closely with our Business Services Teams to promote the hiring of Veterans to private and public employers. During these outreach visits, the CP and the Business Service Teams inform their audiences about the services that MTDLI provides, including CP, and DVOP services. Business Service Teams work together with the CP to create employer awareness of the JVSG program and the duties of the DVOP specialist and CP. The joint effort opens the door to the CP to work with these employers to create potential Veteran employment opportunities. All Job Service Center staff partners are aware of the services available from DVOP and CP staff, this is accomplished through office training sessions.

#### d. The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;

The Performance Incentive Award Program will be operated in accordance with VPL 04-19. The total amount of funds available for Performance Incentive Awards will total one percent of the total JVSG awarded to the state. The Awards will be presented in cash, with the higher amounts going to those that achieve excellence. The number of nominations for office and individual awards varies each year as does the total incentive amount. In order to use all Incentive funds, the amount will be determined by the number of nominations rewarding those scoring the highest that most money. For example last FY top two winners received \$935.85 while those that didn't score as well received \$467.92 while the top office received \$750 and the others who were successful in being nominated received \$350.

Eligible recipients of the JVSG Employee Performance Incentive Awards are as follows: Disabled Veterans' Outreach Program Specialists (DVOPs), Local Veterans Employment Representatives (LVERs) staff, Combined Position (CP), and any other employee who provides services to veterans through employment service delivery programs. Recipients of Performance Incentive Awards can be individuals or a team (such as a local office).

The performance awards will be presented to deserving individuals and to teams during the last quarter of the Federal Fiscal Year. The objective of this award is to encourage individual and office excellence for providing services to qualified Veterans. The highest monetary awards will be presented to those who strive for and achieve excellence service Veterans, this is how we intend to encourage excellence and intent to reward excellence. A detailed report of the Performance Award obligated funds will be provided with the fourth quarter report. These awards recognize eligible employees for excellence in the provision of services or for making demonstrable improvements in the provision of services to Veterans through the American Job Center System. The incentive award will encourage JVSG funded staff and offices to strive for excellence and encourage retention for quality staff.

To be considered for a Performance Award staff and offices must be nominated based on accomplishments, efforts to build Veteran coalitions and efforts to fast track Veteran training and employment options. The staff member must be performing above the negotiated rate to be eligible to receive an award. The award process is inclusive to all Job Service employees who serve Veterans and our non-Federal partners. Offices and individuals who have been nominated will be scored in the categories described above on a scale of 1 to 5 for each category and if their efforts are Innovative, have value, and are measurable.

The Montana State Veteran Coordinator within the Job Service Operations Bureau will administer the funds and all the funds will be presented in Cash awards. The award amount will be dependent on the number of nominations for both individual and team awards. All awards will be based on performance or activities that occurred during the program year for which the award is given. In accordance with VPL 04-19, incentive award funds will be obligated by September 30 and expended by December 31 of each FY.

e. The populations of eligible veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce Agency for services from one-stop delivery system partners (e.g., Native American veterans; veterans in remote rural counties or parishes);

Veterans are an important part of the Montana workforce, with over 50,000 veterans employed. Montana has the 2nd highest rate of veterans among states, but the labor force participation rate of Montana veterans is lower than the national average. Roughly 30% of Montanan's veterans have a disability, which contributes to lower than average labor force participation rates.

DVOPs are charged with providing case management and individualized careers services to eligible Veterans, spouses, and veterans with Significant Barriers to Employment (SBEs) as outlined in Veterans Program Letter (VPL) 03-19, which include:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); special disabled and disabled veterans are those who:
  - are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
  - were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b)), as amended;
- A recently-separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3 (36)).
- Veterans age 18-24
- Vietnam-era Veterans
- Eligible Transitioning Service Members, Spouses, and Caregivers.

f. How the State implements and monitors the administration of priority of service to covered persons;

Per Grant Officer memorandum 01-20, a response to this section is not required.

g. How the State provides or intends to provide and measure, through both the DVOP and American Job Center staff:

1. Job and job training individualized career services,

Per Grant Officer Memorandum 01-20, a response to this section is not required.

2. Employment placement services, and

Per Grant Officer Memorandum 01-20, a response to this section is not required.

3. Job-driven training and subsequent placement service program for eligible veterans and eligible persons;

Per Grant Officer Memorandum 01-20, a response to this section is not required.

h. The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and

Employee Name	Program	Date Assigned	Completed all Required Training (Yes or No)
Dan Altmaier	FT DVOP	9/30/2013	Yes
Eric Beal	.5 DVOP	7/18/2016	Yes
Justin Kendhammer	.5 DVOP	2/22/2018	Yes
Ian Kerr	.5 DVOP	6/11/2018	Yes
Ross Lukkason	FT DVOP	11/01/2011	Yes
Roxy (Nick) Moschetti	.5 DVOP	12/03/2013	Yes
Shannon Noble	FT DVOP	12/03/2012	Yes
Eric Powers	FT CP	02/10/2020	No
Dave Kelly	.5 Program Manager	05/05/2015	Yes

i. Such additional information as the Secretary may require.

Per Grant Officer Memorandum 01-20, a response to this section is not required.

## Senior Community Service Employment Program (SCSEP)

(OMB Control No. 1205-0040)

### a. Economic Projections and Impact

1. Discuss long-term projections for jobs in industries and occupations in the State that may provide employment opportunities for older workers. (20 CFR 641.302(d)) (May alternatively be discussed in the economic analysis section of strategic plan.)

According to data from the Quarterly Workforce Indicators (2018 data, U.S. Census Bureau's Center for Economic Studies), the healthcare and social assistance industry hires the most Montanans 55 and older, followed by retail trade and education services. In fact, research by the Department's Research & Analysis Bureau suggests Montana's nursing workforce is older than the national average, adding to the high levels of job demands for this occupation. (Watson, 2016, <http://lmi.mt.gov/Publications/the-status-of-the-nursing-workforce-in-montana>). Opportunities for healthcare employment are favorable, with expected new job growth of over 1,000 jobs per year in health care, with additional job openings expected from retirements and turnover. Nursing occupations, medical and dental assistance, health information technology specialist, pharmacy technicians, and home health care aides have consistently been among the top jobs for openings and worker needs in Montana for over a decade.

Retail jobs also provide unique opportunities for older workers who wish to remain active in the workforce while also enjoying a semi-retired status. Although labor force participation rates for Montanans over 75 is still relatively low compared to other age groups at 8.4%, Montana has the 5<sup>th</sup> highest labor force participation rate for this group of workers among 50 states (2017 American Community Survey, U.S. Census Bureau). Older workers remain an important component for Montana's overall worker supply.

2. Discuss how the long-term job projections discussed in the economic analysis section of strategic plan relate to the types of unsubsidized jobs for which SCSEP participants will be trained and the types of skill training to be provided. (20 CFR 641.302(d))

Prior to the COVID-19 related business shutdowns, employment growth in Montana has steadily reduced unemployment to sub-normal levels, creating a tight labor market. Businesses reported worker shortages in all industries and regions (although some counties and reservations have higher unemployment rates, detailed later). GDP and personal income growth have continued due to improvements in productivity.[2] Montana's workers have experienced large gains in household income and personal income during this sustained economic expansion.[3] The tight labor market has

been caused by the retiring baby-boomer population and relatively few young adults, combined with steady employment growth.[4] Although Montanans have higher labor force participation rates, higher rates of second job-holding, and higher rates of working past the age of 65 than the national average, the state's population is also older than the national average.[5] Given Montana's expected more prosperous path through the recession than the national expectation, tight labor markets will continue to be an issue as the state re-opens for business after COVID-19.

As mentioned, there are some areas of the state with lagging economies, and some areas that faced large impacts from COVID-19 than other areas of the state. A few rural counties in the northwest corner of Montana faced large job losses during the 2007 recession, and have struggled to regain footing. However, rapid job growth in the more populated northwest counties (specifically Flathead and Lake) has kept the region on the right path, slowly bringing unemployment rates to normal levels.[8] Unfortunately, Flathead County is also expected to be among the counties most impacted by COVID-19, with a higher case count and a greater share of the impacted tourism related industries. One of the impacted northwest counties, Glacier County (and the overlapping Blackfeet Indian Reservation) have also faced setbacks with repeated federal government shutdowns. This traditionally high-poverty reservation counts on federal jobs in Glacier National Park to provide seasonal employment opportunities.

In addition to the rural areas in Northwest Montana, lower demand for coal and coal-fired power has caused instability in Big Horn and Rosebud Counties (and the overlapping Crow and Northern Cheyenne Indian Reservations). These counties are likely to continue to suffer losses in labor income with anticipated power plant closures and the related decline in secondary and tertiary industries.[9] The Department has been active in economic development planning and diversification efforts for these coal-impacted regions using funding from a POWER grant and other state and private sources. The nearby metro of Billings also was a large COVID-19 case node, although the rates of infection in Montana still lagged other states. However, low global energy demand is likely to impact the Billings and South Central region of Montana for the next several years.

With a growing retirement population, healthcare, leisure activities, and construction are expected to be the fastest growing industries in Montana through 2027, although leisure activities are likely to be slow growing through 2022 due to the COVID-19 related shut-downs. These jobs are concentrated in the more populated regions in Montana, with construction workers most needed in the rapidly growing Bozeman region. Mining and utility employment is expected to decline in the next ten years, largely due to the closure of several coal-fired power plants in Eastern Montana, and continued low natural gas prices providing a cheaper fuel source than oil or coal. The information industry, particularly news media is also expected to continue its decline due to consolidation and greater competition from online news sources.

While occupations related to food preparation, sales, and office and administrative support are projected to have the most job openings through 2027, these jobs often can be filled with workers with minimum education and training.[10] Workforce training efforts are therefore targeted towards higher-paying, higher-skill occupations. Occupations requiring postsecondary education that are also projected to have a large amount of job openings include a variety of healthcare occupations (registered nurses, nursing assistants, licensed practical and licensed vocational nurses, medical assistants, and dental assistants), several business-related occupations (accountants and auditors, bookkeeping clerks, and business operations specialists), teachers, computer user support specialists, social workers, heavy and tractor-trailer truck drivers, and automotive service technicians and mechanics. Nearly all of these occupations would be suitable for older workers.

Overall, the most common skill needed now and in future Montana jobs is active listening, and the most common soft skill needed is low levels of service orientation. However, the current workforce already demonstrates those skills, and the skill requirements are not expected to significantly change in the next ten years.

As noted above, occupations related to food preparation, sales, and office and administrative support will have a high volume of openings throughout 2027; therefore, skill training provided to SCSEP participants includes training into those occupations. However, training isn't limited to those

occupations. SCSEP participants have the opportunity to train into any occupation that they are interested in and will be successful in entering and getting back into the workforce.

[1] Local Area Unemployment Statistics, Montana Department of Labor & Industry.

[2] Wagner et al, 2018 Labor Day Report. Montana Department of Labor & Industry. Available at <http://lmi.mt.gov/Publications/PublicationsContainer/labor-day-report-montana-2018>.

[3] Median household income growth, American Community Survey 1-year estimates, U.S. Census Bureau, and personal income from Bureau of Economic Analysis, U.S. Department of Commerce.

[4] Wagner et al, 2018.

[5] American Community Survey, U.S. Census Bureau. Current Population Survey, Bureau of Labor Statistics, U.S. Department of Labor.

[6] Local Area Unemployment Statistics, Montana Department of Labor & Industry, and Current Population Survey, Bureau of Labor Statistics, U.S. Department of Labor.

[7] See annual Labor Day reports since 2008. Available at [lmi.mt.gov/Publications](http://lmi.mt.gov/Publications).

[8] Local Area Unemployment Statistics.

[9] Wagner et al, 2018.

[10] Klungtvedt, 2018. Montana Employment Projections, 2017-2027: Labor Force and Employment Growth.

[11] For full list of undersupplied occupations and programs, please see Watson et al, 2017. "Meeting State Worker Demand: A Report on the Labor Market Outcomes of Montana Colleges" available at <http://lmi.mt.gov/Publications/PublicationsContainer/meeting-state-worker-demand>.

[12] Calculation by Montana Department of Labor & Industry (DLI) using 2017 American Community Survey 1-year estimates for workers by age along with DLI labor force forecasts for future labor force participation rates.

### 3. Discuss current and projected employment opportunities in the State (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))

The current and projected employment opportunities for SCSEP participant are identified in (1) and (2); however, the rural nature of Montana makes service delivery and training challenging across the state. Generally SCSEP participants have little or poor work history with very little skills, therefore the types of skills available among the eligible populations have direct implications for recruiting host agencies; the types of training positions available at host agencies; skill training offerings that the grantees can locate or develop; and other training linkages. In addition, to the low skill levels, there are significant gaps in training and education that individuals received and those skills may need updating or retrained to meet new workplace needs. In addition to training provided through host agencies, there are also opportunities to coordinate with WIOA Title I programs and leverage training and education provided through Montana's ETPL.

The focus is to prepare older workers for jobs through community service placements as well as coordinating and co-enrolling, as appropriate, with WIOA Title I programs or other programs such as Vocational Rehabilitation to provide older workers the opportunity for the occupational skills training to help participants obtain the skills needed for these jobs. SCSEP participants also register at Job



Service Workforce Centers where they can benefit from Wagner-Peyser job search and placement programs.

## **b. Service Delivery and Coordination**

**1. A description of actions to coordinate SCSEP with other programs. This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:**

**A. Planned actions to coordinate activities of SCSEP grantees with WIOA title I programs, including plans for using the WIOA one-stop delivery system and its partners to serve individuals aged 55 and older. (20 CFR 641.302(g), 641.325(e))**

Montana's SCSEP grantee achieves integration of SCSEP with WIOA Title I Adult and Dislocated Worker Programs, Wagner-Peyser Programs, Montana's business community, and other partners by engagement and membership with Community Management Teams (CMT), which include core partners and community-based partners. In addition, the SCSEP grantee's staff coordinate services through the one-stop system by serving clients in the one-stop's office space to ensure clients are able to receive additional services from WIOA and other co-located partners as appropriate.

Specifically, the SCSEP grantee refers all clients to Wagner-Peyser for job search, client registration, and assessment. Once client intake is complete, the client is then referred to other WIOA Title I programs and partner programs for co-enrollment as appropriate.

**B. Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the State under the other titles of the Older Americans Act (OAA). (20 CFR 641.302(h))**

Montana's SCSEP sub-grantee partners with and administers some of the following programs under OAA and USDOL to help older workers:

- AARP;
- Adult Protective Services Transportation Advisory Councils;
- Ticket-to-Work Office on Aging;
- Community-based health centers;
- Community-based transportation providers;
- Montana's Area Agencies on Aging;
- Montana Department of Labor & Industry Programs;
- Montana Independent Living Centers;
- Private non-profit agencies providing employment services;
- Veteran service providers;
- County Extension offices;
- Community-based organizations, including:

- Good Will;
- Good Samaritan;
- St. Vincent DePaul;
- Salvation Army Ministries;
- Rocky Mountain Development Council;
- Human Resource Development Council;
- Habitat for Humanity; and
- Local food banks.
- Vocational Rehabilitation and Blind Services; and
- Montana's Native American tribes.

Montana's SCSEP grantee coordinates activities with the groups listed above by partnering and attending conferences and job fairs offered and coordinate education opportunities about SCSEP. In addition, many of the community-based organizations also serve as host agencies for training of SCSEP participants. The SCSEP grantee will continue coordinating services across partner programs and looking for additional opportunities to partner throughout the state to best serve SCSEP participants.

Planned activities with partners vary across the state based on the availability of services, population, and community need. Activities and coordination of services across partners, include, but aren't limited to:

- Job fairs;
- Conferences;
- Participation in community-based boards or councils designed to coordinate services across common populations, including seniors;
- Economic development boards or groups, like local Chambers of Commerce or other business groups.

### C. Planned actions to coordinate SCSEP with other private and public entities and programs that provide services to older Americans, such as community and faith-based organizations, transportation programs, and programs for those with special needs or disabilities. (20 CFR 641.302(i))

Montana's SCSEP grantee coordinates with partner agencies focused on serving individuals with disabilities throughout the state. Some examples of partner agencies and programs include, but are not limited to:

- Vocational Rehabilitation and Blind Services administered through Montana's Department of Public Health and Human Services;
- Montana's Independent Living Project;
- Businesses and host agencies engaged in employment and training for participants;
- Workforce programs administered throughout the state;
- National Ticket-to-Work program administered in Montana by Experience Works, Inc.;

In addition to the examples listed above, Montana's SCSEP grantee works with community-based organizations throughout the state to best serve individuals based on their location and specific needs.

Montana's SCSEP plans to coordinate with other partner agencies on job fairs, targeted outreach to potential clients, community-based education about the programs, client coordination for co-enrollments, and coordinating on local and community-based boards and councils to best serve shared populations.

#### **D. Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))**

SCSEP has not participated in planning processes to apply for DOL-funded industry training initiatives; however, the SCSEP grantee participates at the local and community level on workforce training and economic development collaborations within regions throughout the state. Due to Montana's geographic size and industry mix, local collaborations take into account the industry sectors and workforce development opportunities and needs within the region, and SCSEP works within the groups to ensure training opportunities are available for the older populations it serves.

#### **E. Actions to ensure that SCSEP is an active partner in the one-stop delivery system and the steps the State will take to encourage and improve coordination with the one-stop delivery system. (20 CFR 641.335)**

Montana's SCSEP grantee (state and national) worked with WIOA partners to establish and sign the WIOA memorandum of understanding to ensure services are coordinated through Montana's one-stop system. In addition, to service coordination through the one-stop system, Montana's SCSEP grantee participates at the community level by participating in Community Management Teams and other community-based workforce initiatives. The grantee's participation ensures that older workers are afforded the same opportunities as any other subgroup receiving services through workforce programs.

As a cost-saving provision, Montana's SCSEP national grantee's staff work remotely to serve participants in the program. To ensure the program has a community presence, staff work with community-based partners outside the one-stop system to serve clients. Additional partners include public libraries and private businesses who offer services and space in their facilities.

#### **F. Efforts to work with local economic development offices in rural locations.**

The SCSEP grantee collaborates with economic development offices throughout the state in order to promote and educate economic development entities about the benefits of employing and working with older workers. In addition, economic development staff are represented on many Community Management Teams across the state and this provides additional opportunity for collaboration on SCSEP programs.

## **2. The State's long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants in unsubsidized employment. (20 CFR 641.302(e)) (May alternatively be discussed in the State strategies section of strategic plan.)**

Montana's SCSEP grantee coordinates with the state's One-Stop System to engage with employers and businesses throughout the state. Because employer recruitment is an important component to successfully place participants, it's a priority for the SCSEP program. Recruitment efforts include an education component designed to inform employers about the benefit and value of hiring older workers and making opportunities available to them. Employer and business engagement has strengthened relationships and resulted in increased placement of SCSEP participants in unsubsidized employment across Montana. The SCSEP grantee will continue engaging with employers, the business community, and the One-Stop System to ensure SCSEP participants are best served throughout the state and increase their employment opportunities.

### 3. The State's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))

Montana's SCSEP grantee receives an annual minority report from the US Department of Labor about Montana's minority populations. This report is used to determine if the program is underserving minority populations and develops a plan about how to best serve minority populations across the state. The current demographic information for Montana's SCSEP grantee is below:

Minority Groups	U.S. Census	2018 Minority Report II	PY 2019-Q2 YTD MT
Overall	12.90%	26%	28%
Hispanic	6.40%	8%	9%
Black	4%	5%	5%
Asian	3%	0%	0%
American Indian	2.90%	13%	14%
Pacific Islander	0%	0%	0%

Montana's SCSEP grantee recruits minority participants by direct outreach to minority churches, organizations, community-based agencies that serve minority populations, and organizations that serve multi-cultural populations. SCSEP staff also give guest lectures and conduct workshops to recruit and educate groups about the program. In addition, SCSEP advertises in local newspapers, including tribal newspapers, and senior publications to promote the program.

The SCSEP grantee directly serves two of Montana's reservation communities and is active on the remaining four reservations to ensure services are available to potential program participants.

The long-term strategy for best serving and increase services and outcomes for minority populations throughout the state is to build on current relationships with community-based partners and increase awareness and provide training to all employees and partners on diversity issues. In addition, the Diversity and Inclusion committee, comprised of the organizations listed above, focuses on building relationships with minority organizations to foster a culturally sensitive workplace and measure the effectiveness of recruitment efforts. Outreach materials that encourage minorities to apply are distributed throughout the Montana SCSEP areas with all materials made available in Spanish and will be converted to other languages as requested.

### 4. A list of community services that are needed and the places where these services are most needed. Specifically, the plan must address the needs and location of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)

When demographic and economic data is available Montana's SCSEP grantee works with other Montana agencies, including one-stop partners to serve populations most in need throughout the state. Currently there are 217 authorized national positions and 51 authorized state positions in the program.

SCSEP serves 49 of the 56 counties across Montana and the areas that most need the SCSEP program are the hardest to serve communities. These communities are often remote and rural with limited commerce and limited employment opportunity. Most Montana counties fall under a hard-to-serve designation and there is a variance in place for both the national and state SCSEP grantee reflecting this. Montana continues monitoring and analyzing community service needs across the state in an effort to better serve current and potential participants.

Throughout the state there is more demand for services provided under SCSEP than the program has the capacity to provide. In addition, the low population densities and large distances between clients in hard-to-serve counties makes service delivery particularly challenging. Additionally, rural areas often have limited opportunity for community service assignments, training and jobs for participants.

Senior populations that benefit from community service work are those with time and energy, seniors over 65, ex-convicts, retired people (especially farmers and ranchers), all age groups if capable of physical work, the unemployed, and economically disadvantaged older persons.

Common local community service needs in Montana include:

- Janitors, cooks, librarians, teacher aides, or mentoring in schools;
- Working in prisons;
- Jobs in tourist areas;
- Cleaning road ditches and doing flower enhancements along streets or in parks;
- Providing office support services for nonprofits, municipal, county, state, and federal agencies;
- Making signs;
- Serving as job developers;
- Advising local businesses;
- Cleaning rest areas;
- Providing after-school programs and childcare for children;
- Gift-shop attendants; and
- Service attendants for food pantries and clothing give-away programs.

**5. The State's long-term strategy to improve SCSEP services, including planned long-term changes to the design of the program within the State, and planned changes in the use of SCSEP grantees and program operators to better achieve the goals of the program. This may include recommendations to the Department as appropriate. (20 CFR 641.302(k))**

Montana's SCSEP grantee focuses on serving eligible clients by providing training opportunities to improve or build skill levels for jobs available in communities. Long-term the program's goal is to

assure that job matching is appropriate for both the employer and older worker so that the relationship will be retained to the benefit of the employer, the older worker and the state's economy.

SCSEP is committed to growing and sustaining partnerships with nonprofits, public agencies, and community partners throughout the state to ensure the program is able to adequately serve Montana's older workers and meet its negotiated goals.

To ensure Montana's SCSEP participants obtain the skills necessary to compete in the modern workforce, the program is doing the following:

- Help SCSEP participants attain the skills (such as computer and healthcare-related skills) to better fill the employment needs in the state;
- Work with and expand on the nonprofit agencies to provide meaningful community service assignments that fill a current need within the community;
- Work with businesses and nonprofit agencies to develop good training assignments where skills are learned on-the-job and unsubsidized employment will be the end result in more situations;
- Assist the business community in finding ways to attract and employ the older worker;
- Educate businesses about the value of hiring older workers;
- Continue coordinating and partnering with Montana's One-Stop System;
- Seek out opportunities to colocate or hotel SCSEP field personnel within Montana's One-Stop System throughout the state;
- Target services to American Indians by working more closely the WIOA 166 grantees;
- Expand Area Agencies on Aging referrals;
- Develop and sustain partnerships with groups that advocate and provide services to people with disabilities, minority populations, and veterans;
- Expand coordination with the state of Montana's Aging and Disability Resource Center (ADRC) program; and
- Expand business relationships with Montana Chambers of Commerce.

## 6. The State's strategy for continuous improvement in the level of performance for SCSEP participants' entry into unsubsidized employment, and to achieve, at a minimum, the levels specified in OAA Section 513(a)(2)(E)(ii). (20 CFR 641.302(f))

Montana's SCSEP grantee developed the following strategies for continuous improvements:

- **Targeting Jobs:** Montana's SCSEP has been successful in placing participants in unsubsidized employment with community service agencies and host agency training sites. A significant portion of SCSEP's unsubsidized placement occurs when the community service training site hires SCSEP participants that trained on-site.
- **Partnership with Montana's One-Stop System:** SCSEP monitors information on job opening and trends, through partnerships with the One-Stop System, that identify current and future regional job opportunities.
- **Workforce Partnerships:** SCSEP has established relationships with the following workforce partners:

- Job Service, which administers WIOA Title I Adult and Dislocated Worker programs, the Wagner-Peyser program, and other workforce programs;
  - Vocational Rehabilitation Services;
  - Adult Services and Aging programs;
  - Adult Education programs; and
  - Local economic development and business associations.
- Upgrading and maintaining participant skills: Participant training is key to successful program performance. Older workers often have employability skills that employers value; however, older workers often lack technical skills to succeed in the modern workforce. SCSEP participants are more often successful in the workforce because of training provided through the program and employer engagement.
  - Ongoing Assessments of Skills: SCSEP participants are assessed using JobReady, which includes on-line assessment and the Individual Employment Plan as well as training in a variety of skills. Completing JobReady training courses can result in certification of skills following successful testing of the subject matter. Many participants take advantage of this training as it can be done at any time from any computer. Each potential applicant is assessed to determine their interests and current skill level. In addition, participants are assessed for their physical abilities and offered a general physical to ensure participants are trained and placed in appropriate employment settings. Assessment is ongoing for participants based on their Individual Employment Plan, and throughout their participation in the program.
  - Expanding and maintaining partnerships with the business community: SCSEP continues to work with the business community to gather input from the business community on the workforce needs. In addition, SCSEP works closely with business partners to ensure participants placed within an organization are adequately trained to meet the job requirements. Input received from the business community enables SCSEP grantees and the workforce community to provide more meaningful training opportunities for older workers and find opportunities for unsubsidized job placement with a higher degree of retention.

In addition to the strategies for continuous improvement listed above, Montana's SCSEP subgrantee provide a quarterly report that is reviewed and technical assistance is provided in areas needing improvement if needed.

## c. Location and Population Served, including Equitable Distribution

### 1. A description of the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))

Montana SCSEP grantee serves clients statewide and Montana is geographically large and highly rural which creates challenges for serving clients throughout the state. The SCSEP grantee works with a number of partners and agencies to overcome those challenges. Partners include the following:

- AARP;
- Adult Protective Services Transportation Advisory Councils;
- Ticket-to-Work Office on Aging;

- Community-based health centers;
- Community-based transportation providers;
- Montana's Area Agencies on Aging;
- Montana Department of Labor & Industry Programs;
- Montana Independent Living Centers;
- Private non-profit agencies providing employment services;
- Veteran service providers;
- County Extension offices;
- Community-based organizations, including:
  - Goodwill;
  - Good Samaritan;
  - St. Vincent DePaul;
  - Salvation Army Ministries;
  - Rocky Mountain Development Council;
  - Human Resource Development Council;
  - Habitat for Humanity; and
  - Local food banks.
- Vocational Rehabilitation and Blind Services; and
- Montana's Native American tribes.

Service delivery in rural counties like Carter, Custer, Fallon, Fergus, and Judith Basin is more challenging due to the remote or economically depressed conditions that exist. In addition, barriers that exist limit opportunities for community service assignments, training, and jobs. The most populated counties in the state like Flathead, Lewis & Clark, Gallatin, and Yellowstone have the majority of hard-to-serve seniors.

The state collects, monitors, and analyses community service needs throughout the state on an ongoing basis. The SCSEP grantee uses information collected by the state, including labor market information, economic reports, and other information provided through the state of Montana's Research and Analysis Bureau to understand the state's workforce and economic picture and target training and outreach based on data provided.

Community service needs are identified across the state and consistently, SCSEP participants need assistance with the following:

- Utilities;
- Food;
- Clothing;
- Weatherization;
- Day care;
- Household items;



- Transportation;
- Legal assistance;
- Language learning and tutoring;
- Disability services; and
- Literacy.

2. List the cities and counties where the project will be conducted. Include the number of SCSEP authorized positions and indicate where the positions changed from the prior year.

County	Cities	PY'18 State Grantee AP	PY'19 National Grantee AP	PY'18 State Grantee AP	PY'19 National Grantee AP
Beaverhead	Dillon	0*	3	0*	3
Big Horn	Pryor, Harden, Lodge Grass	2	2	2	2
Blaine	Chinook	0*	2	0*	2
Broadwater	Townsend	0*	2	0*	2
Carbon	Red Lodge	0*	4	0*	4
<b>Carter</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Cascade	Great Falls, Cascade, Belt	5	15	5	15
Choteau	Fort Benton	0*	1	0*	1
Custer	Miles City, Lame Deer, Ashland	2	3	2	3
<b>Daniels</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Dawson	Glendive	0*	2	0*	2
Deer Lodge	Anaconda	0*	3	0*	3
<b>Fallon</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Fergus	Lewistown	0*	4	0*	4
Flathead	Kalispell, Whitefish, West Glacier, Big Fork, Coram	8	15	8	15
Gallatin	Bozeman, Belgrade	3	7	3	7
Glacier	Cut Bank, Browning	0*	5	0*	5
<b>Granite</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Hill	Havre	0*	4	0*	4
Jefferson	Boulder	0*	3	0*	3
<b>Judith Basin</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

County	Cities	PY'18 State Grantee AP	PY'19 National Grantee AP	PY'18 State Grantee AP	PY'19 National Grantee AP
Lake	Polson, Elmo, Ronan, Pablo	6	5	6	5
Lewis and Clark	Helena, East Helena, Augusta, Lincoln	5	6	5	6
<b>Liberty</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Lincoln	Libby	0*	9	0*	9
Madison	Virginia City	0*	3	0*	3
<b>McCone</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Meagher	White Sulphur Springs	0*	1	0*	1
Mineral	Superior	0*	2	0*	2
Missoula	Missoula, East Missoula, Frenchtown	7	13	7	13
Musselshell	Roundup	0*	2	0*	2
Park	Livingston	0*	5	0*	5
Phillips	Malta	0*	2	0*	2
Pondera	Conrad	0*	2	0*	2
Powder River	Broadus	0*	1	0*	1
Powell	Deer Lodge	0*	2	0*	2
Prairie	Terry	0*	1	0*	1
Ravalli	Hamilton, Stevensville, Corvalis, Darby	5	12	5	12
Richland	Sidney	0*	2	0*	2
Roosevelt	Wolf Point	0*	3	0*	3
Rosebud	Forsyth	0*	3	0*	3
Sanders	Thompson Falls	0*	5	0*	5
Sheridan	Plentywood	0*	1	0*	1
Silver Bow	Butte	0*	11	0*	11
Stillwater	Columbus	0*	3	0*	3
Sweet Grass	Big Timber	0*	1	0*	1
Teton	Choteau	0*	2	0*	2
Toole	Shelby	0*	1	0*	1
Valley	Glasgow	0*	2	0*	2
Wheatland	Harlowton	0*	1	0*	1
Wibaux	Wibaux	0*	1	0*	1

County	Cities	PY'18 State Grantee AP	PY'19 National Grantee AP	PY'18 State Grantee AP	PY'19 National Grantee AP
Yellowstone	Billings, Park City, Ballantine, Laurel	8	22	8	22
TOTAL AP		51	199	51	199

**Bold= Counties not served by SCSEP**

\*=Counties not served by state grantee

### 3. Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

The U.S. Department of Labor at their website SCSEPED.org provides quarterly data that shows the number of authorized positions, the number of current enrollments at the end of the last quarter, and the variances in each county. The Montana Department of Labor and Industry and the sub-grantee uses this website and tool as a method to keep abreast and manage the slots to assure equitable distribution of positions. The sub-grantee will be advised to limit or stop enrollment of new participants in overserved counties and move current participants into unsubsidized employment. In addition, the sub-recipient will be advised to focus on recruitment in the currently underserved counties through increased coordination efforts with WIOA, Older Americans Act programs, private and public entities, and local economic development offices.

The SCSEP grantees continues to work toward equitable distribution in each county. There are no counties that are significantly over-served or under-served with a variance of 1-5 of their equitable share based on U. S. Census 2010 data.

### 4. The State's long-term strategy for achieving an equitable distribution of SCSEP positions within the State that:

#### A. Moves positions from over-served to underserved locations within the State in compliance with 20 CFR 641.365.

Montana has been aggressively promoting the SCSEP throughout the state. Participants assigned to the Participant Support Center in Billings, MT actively recruit by calling current and former host agency training sites. They ask permission to send recruiting flyers for those current and former training sites to post at their locations. This same activity is taking place throughout the state with libraries, senior centers, quick stop convenience stores, veteran's centers, agencies on aging, food pantries and distribution centers, subsidized housing facilities, service organizations, and others who commonly or regularly come in contact with our age demographic.

Montana's SCSEP subgrantee works regularly with Montana One-Stop Service Centers and hold announced, scheduled open enrollment days. The subgrantee also works with the Montana One Stops to search for and find appropriate job openings for our qualified, job-ready participants.

Employment and Training Counselors regularly connect with current participants and ask them if any of their friends, neighbors, or acquaintances might benefit from the SCSEP job-training program.

The common goal for both SCSEP grantees is to distribute the workers served by the program in accordance with the equitable distribution of positions per county.

The SCSEP grantees are consistently working toward equitable distribution in each county. There are no counties that are significantly over-served or under-served based on U. S. Census 2010 data. Under-enrollment in some counties may be due to the large, rural and sparsely populated rural areas that also have a higher unemployment rate than the state's average unemployment rate. Over-enrollment in some counties may be due to those counties being more urban in nature with one of

them being the largest city in the state. The concentrated population in these counties generally leads to a push to enroll more participants because they provide the most opportunities for outreach to potential enrollees and employers. SCSEP grantees work closely to coordinate recruitment and enrollment efforts and to determine the potential to move authorized positions at some point. If positions become vacant through attrition, the position will be filled from the current waiting list. This will ensure Montana's counties are served appropriately so that authorized positions in the counties more closely align with equitable distribution.

There have not been any significant large increases of eligible persons in any of our Montana counties.

Montana SCSEP has 51 authorized positions in ten counties. The national SCSEP grantee has 199 authorized positions in 45 counties out of the total 56 counties in Montana. All but four of the counties served by the national SCSEP grantee also have state-designated positions as well. Even with population shifts each year that cause some counties to be over-served and some to be under-served, the authorized numbers meet the Census figures.

## **B. Equitably serves rural and urban areas.**

The SCSEP grantees are consistently working toward equitable distribution in each county. There are no counties that are significantly over-served or under-served based on U.S. Census 2010 data.

Under-enrollment in some counties may be due to the large, rural and sparsely populated areas that also have a higher unemployment rate than the state's average. Over-enrollment in some counties may be due to those counties being more urban in nature. The concentrated population in these counties generally leads to a push to enroll more participants because they provide the most opportunities for outreach to potential enrollees and employers.

SCSEP grantees work closely to coordinate recruitment and enrollment efforts and determine the potential to move authorized positions at some point. If positions become vacant through attrition, the position will be filled from the current waiting list. This will ensure Montana's counties are served appropriately so that authorized positions in the counties more closely align with equitable distribution.

The national SCSEP grantee has authorized positions in fifty-one counties out of the total fifty-six counties in Montana. Ten of these counties also have state-designated positions. Even with population shifts each year that cause some counties to be over-served and some to be under-served, the authorized numbers meet the Census figures.

## **C. Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)**

Montana state SCSEP priority for service is provided to eligible individuals who meet one or more of the following criteria:

- Aged 65 years or older;
- Have a disability;
- Have limited English proficiency or low literacy skills;
- Reside in a rural area;
- Are veterans or their spouses who meet the requirements of the Jobs for Veterans Act;
- Have low employment prospects;
- Have failed to find employment after using services provided through the one-stop delivery system; or
- Are homeless or at risk of homelessness.

Montana's SCSEP goal is to serve these populations at least in proportion to their percentage of the total population. Program activities are provided to ensure successful participation of these groups. Each applicant's eligibility is determined by an interview and documented on an intake form.

The long-term strategy for increased services to these populations is through additional training, community-outreach, participation in job fairs or other community recruitment or education events, and increased partnerships with organizations serving any of the priority populations listed above.

## 5. The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))

Montana uses the most current Equitable Distribution Report to reflect the number of eligible individuals in each county to the total eligible population in the state. Montana is primarily rural in nature and according to the Montana 2010 Census there are three counties classified as urban areas:

- Cascade County whose total population 81,327 - 80.2% of the population considered as being in an urban cluster and 19.8% rural;
- Missoula County, whose total population is 109,299 - 77.7% of the population considered as being in an urban cluster and 22.3% rural; and
- Yellowstone County, population 147,972 - 83.3% of the population considered as being in an urban cluster 16.7 of the population are rural.

The remainder of Montana's counties are rural:

- Big Horn County; Population 13,242; 10% of Eligible Population; 2 Authorized Positions; Ratio 671:1;
- Cascade County; Population 82,384; 45.4% of Eligible Population; 5 Authorized Positions; Ratio 7480:1;
- Custer County; Population 11,951; 17.5% of Eligible Population: 2 Authorized Positions; Ratio 1045:1;
- Flathead County; Population 93,068; 17.7% of Eligible Population; 8 Authorized Positions; Ratio 2059:1;
- Gallatin County; Population 94,720; 9.5% of Eligible Population; 3 Authorized Positions; Ratio 2999:1
- Lake County; Population 29,017; 16.8% of Eligible Population; 6 Authorized Positions; Ratio 975:1;
- Lewis and Clark County; Population 65,338; 13.8% of Eligible Population; 6 Authorized Positions; Ratio 1503:1;
- Missoula County; Population 111,807; 11.4% of Eligible Population; 7 Authorized Positions; Ratio 1159:1;
- Ravalli County; Population 40,823; 19.2% of Eligible Population; 5 Authorized Positions; Ratio 1567:1; and
- Yellowstone County; Population 154,162; 14.1% of Eligible Population; 8 Authorized Positions; Ratio 3,623:1.

## 6. The relative distribution of eligible individuals who:

### A. Reside in urban and rural areas within the State

The SCSEP Equitable Distribution report is the primary means for providing the state with the data it needs to ensure that all eligible populations and target groups are properly served. The formula outlines the service level to individuals residing in urban and rural areas within the state, those that have the greatest economic need, minorities, individuals with limited English proficiency, and those who have the greatest social need.

Montana is a very large, rural state with ongoing challenges and barriers. Challenges and barriers include:

- Shortages of quality host agencies that can provide the training that matches the employment goals for participants;
- Shortages of employers that have a presence in the rural areas that are seeking new employees in general;
- The economy in some of the counties is depressed; and
- Public transportation is available in the larger communities but is non-existent in the very rural areas.

It is very difficult, in the most rural areas of Montana, to recruit both eligible participants and develop host agencies due to distance, language, transportation, etc. These challenges make it essential that both rural and urban areas are served equitably and that older workers living in rural areas have access to the same training and employment resources as those living in urban areas.

The SCSEP grantee makes every effort to accommodate enrollees whenever suitable arrangements can be made including flexibility in scheduling training. The SCSEP grantee coordinates and works with organizations within communities to:

- Address rural needs using small scale methods appropriate to the uniqueness of each community;
- Identify the inequities in resources to equitably serve SCSEP participants in both rural and urban counties across the state;
- Identify those inequities specific to rural areas that can be changed or addressed and promote the development of new training sites and employment opportunities for participants; and
- Identify tools and resources to rally communities to help with the needs of the eligible population.

## **B. Have the greatest economic need**

Currently 90% of Montana's SCSEP participants are living in poverty and want or need to work to pay for necessities, including food, housing, healthcare, and transportation. Many SCSEP participants are below the age of 65 and may not receive Social Security benefits, therefore, they need to supplement their income through employment.

## **C. Are minorities**

In Montana American Indians are the main minority population and are served at approximately 21% of total enrollments. This minority population is underserved in SCSEP based on the number of the eligible population. Montana has seven reservations, three of which are in or near the most heavily populated counties. The SCSEP grantee works with local agencies and representatives in areas on or near the reservations to target recruitment activities. The total minority population within Montana's SCSEP is approximately 26% of the total enrollments. The following are minority statistics of participants pulled from the PY'18 year end performance report: American Indian 21% Asian/Native Hawaiian/Pacific Islander 0% Black or African American 0% Hispanic, Latino or Spanish Origin 5%. The SCSEP grantee is made aware of individuals who are new to communities and may be in need of

SCSEP training opportunities through professional networks and Montana's One-Stop System. Statewide outreach by the SCSEP grantee allows for proactive identification of minority individuals in need of services.

#### D. Are Limited English Proficient

As of the PY'18 final quarter report 0% of participants served were limited English proficient. The SCSEP grantee uses the same recruitment techniques for individuals who are limited English proficient as the recruitment of other most-in-need populations. Recruitment efforts include: recruitment through the one-stop system; advertisements; local organizations; and working closely with local community members of ethnic or cultural groups to identify limited-English speaking individuals.

#### E. Have the greatest social need. (20 CFR 641.325(b))

Many individuals served under SCSEP qualify as having a great social need because of the rural nature of Montana. Criteria for an individual with the greatest social need include participants with little or no employment history, no basic skills, no high school education or identified as a high school drop-out, English language deficient, disabled, homeless, or living in a socially or economically isolated area where there are limited employment opportunities.

There is currently no metric for social need outside of measuring individuals with disability. SCSEP's PY'18 fourth quarter end report showed that 29% of enrolled participants had some form of disability.

#### 7. A description of the steps taken to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data become available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))

Montana's SCSEP grantees will ensure that individuals who want to work have the opportunity to do so through the services SCSEP provides. The US Department of Labor provides the distribution factor based on current census data. The distribution factor is the current formula for defining the equitable share of SCSEP positions for each county based on the proportion of income and age-eligible population by county annually. The SCSEP grantees determine which counties are over or underserved and calculates the movement of positions in order to bring about equity. Montana's SCSEP grantees ensure there is either no or minimal disruption to participants and service delivery throughout the years due to redistribution of funds. The equitable distribution report is submitted to the US Department of Labor for approval annually.

## Performance Indicator Appendix

### All WIOA Core Programs

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

#### All WIOA Core Programs

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

## Additional Indicators of Performance

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

## Other Appendices